OFFICE OF INSURANCE REGULATION

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CITIZENS PROPERTY INSURANCE CORPORATION
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October 6, 2009

Kevin McCarty, Commissioner
Office of Insurance Regulation
200 East Gaines Street
Tallahassee, Florida 32399-0330

Attention: Richard Koon, Director of Property and Casualty Product Review

Re: Citizens' Commercial Non-Residential Wind-Only

Dear Mr. McCarty:

On behalf of the Board of Governors of Citizens Property Insurance Corporation, we respectfully submit this rate filing pursuant to Section 627.351(6)(n), Florida Statutes, which provides that beginning on July 15, 2009, Citizens must make a recommended actuarially sound rate filing for each line of business it writes, with an effective date no earlier than January 1, 2010.

During the 2009 Legislative Session, Florida Statute 627.351(6)(n) was amended to provide, in pertinent part for the following sections:

6. *Beginning on or after January 1, 2010, and notwithstanding the board's recommended rates and the office's final order regarding the corporation's filed rates under subparagraph 1., the corporation shall implement a rate increase each year which does not exceed 10 percent for any single policy issued by the corporation, excluding coverage changes and surcharges.*

7. *The corporation may also implement an increase to reflect the effect on the corporation of the cash buildup factor pursuant to s. 215.555(5) b.*

8. *The corporation's implementation of rates as prescribed in subparagraph 6. shall cease for any line of business written by the corporation upon the corporation's implementation of actuarially sound rates. Thereafter, the corporation shall annually make a recommended actuarially sound rate filing for each commercial and personal line of business the corporation writes.*

James R. Malone, Chairman, Collier County
William P. Corry, Indian River County ● Carol Everhart, Pinellas County ● Earl Horton, Pinellas County
Sherrill W. Hudson, Miami-Dade County ● Allan Katz, Leon County ● Carlos Lacasa, Hillsborough County
Scott Wallace, President/CEO & Executive Director

In accordance with this statute, Citizens performed an actuarial rate analysis for the commercial non-residential wind-only program. The purpose of this filing is to:

- Recommend an indicated rate change to the Florida Office of Insurance Regulation;
- Calculate proposed rate changes that reflect the statutory 10% rate cap on policy increases;
- Calculate proposed rate changes that reflect a 10% rate cap on policy decreases; and
- Develop an additional charge to account for the cost associated with the FHCF build up factor.

If you or your staff has any questions, please contact me at (904) 208-7593.

Sincerely,

Brian Donovan, FCAS, MAAA
Director, Actuarial Services

James R. Malone, Chairman, Collier County
William P. Corry, Indian River County ● Carol Everhart, Pinellas County ● Earl Horton, Pinellas County
Sherrill W. Hudson, Miami-Dade County ● Allan Katz, Leon County ● Carlos Lacasa, Hillsborough County
Scott Wallace, President/CEO & Executive Director

CITIZENS PROPERTY INSURANCE CORPORATION

PERSONAL COMMERCIAL NON-RESIDENTIAL WIND-ONLY (PRCNR-W)

HOMEOWNERS RATE/RULE FILING

OCTOBER 2009

SEPTEMBER 2009

Submitted by
Citizens Property Insurance Corporation
101 North Monroe St. Suite 1000
Tallahassee, Florida 32301

FILING PURPOSE

This is a Homeowners rate and rule filing for the Personal Commercial Non-Residential Residential Multi-peril (PRCNR-WM) of Citizens Property Insurance Corporation (Citizens).

This filing is being made to comply with applicable statutory ratemaking provisions, which are as follows:

§627.351(6)(n)1. *Rates for coverage provided by the corporation shall be actuarially sound and subject to the requirements of s. 627.062, except as otherwise provided in this paragraph. The corporation shall file its recommended rates with the office at least annually. The corporation shall provide any additional information regarding the rates which the office requires. The office shall consider the recommendations of the board and issue a final order establishing the rates for the corporation within 45 days after the recommended rates are filed. The corporation may not pursue an administrative challenge or judicial review of the final order of the office.*

§627.351(6)(n)3. *After the public hurricane lossprojection model under s. 627.06281 has been found to be accurate and reliable by the Florida Commission on Hurricane Loss Projection Methodology, that model shall serve as the minimum benchmark for determining the windstorm portion of the corporation's rates. This subparagraph does not require or allow the corporation to adopt rates lower than the rates otherwise required or allowed by this paragraph.*

§627.351(6)(n)6. *Beginning on or after January 1, 2010, and notwithstanding the board's recommended rates and the office's final order regarding the corporation's filed rates under subparagraph 1., the corporation shall implement a rate increase each year which does not exceed 10 percent for any single policy issued by the corporation, excluding coverage changes and surcharges.*

FILING BACKGROUND

Citizens' rates have been frozen by law since 2007. Its current rates were developed, filed and implemented in 2006 based upon private insurer data from 2005, and in compliance with the dual standard that was prescribed by law at the time. This standard required Citizens to charge actuarially sound rates that were not competitive with either the largest 20 private carriers in Florida for personal lines, or with the largest 5 private carriers in Florida for commercial lines.

The law now provides that rates for coverage provided by Citizens shall be actuarially sound and subject to the provisions of 627.062, which governs rates for property and casualty insurers. The non-competitive requirement contained in prior law has been deleted. By law, Citizens must make recommended actuarially sound rate filings annually for each personal and commercial line of business it writes, for implementation no earlier than January 1, 2010. In 2009 the law was further amended to limit rate increases each year to no more than 10% for any single policy, excluding coverage changes, surcharges and the Florida Hurricane Catastrophe Fund (FHCF) cash build-up provision.

On July 8, 2009, Citizens' Board of Governors approved the submission of recommended rate filings with the Office of Insurance Regulation on or after July 15, 2009 for implementation no earlier than January 1, 2010 that include:

- Actuarial indications developed using Citizens projected operating expenses (including the increased cost of TICL coverage) and five years of non-catastrophe loss history
- Actuarial indications developed using catastrophe modeling for projected wind losses based upon the approved versions of RMS version 6.0bRMS model for commercial policies, and upon the Public Model for personal residential policies
- A policyholder level cap of up to 10% for rate increases and decreases. The cap, as prescribed by law, does not apply to coverage changes, surcharges or the FHCF cash build-up provision.

This filing amends Citizens filing #07-0683618275, dated JuneSeptember 1328, 2005 2007 and approved MayJanuary 1822, 20072008.

INDICATION SUMMARY

Below is a summary of the rate indication and the actual rate change. The difference is due to a +/- 10% rate change cap for all policyholders.

Line of Business	Indication	Rate Change
HW2/DW2CNRW	3212334.5 6%	9.9%

Citizens performed a detailed analysises separately for each of the three policy formsCNRW policies. As part of this rate filing, there are proposed changes to the following items:

- Base classHurricane Bbase Ratespremiums
- WindOther Wind base premiums exclusion credits
- Introduction of FHCF cash rapid built-up factor

FILING OVERVIEW

The indication in this filing is for all Personal Commercial Non-Residential Wind-Only policies excluding builders risk and special class items. All premiums and losses due to builders risk and special class items have been excluded. Builders risk has been excluded from the indication since there are many uncertainties surrounding these structures. One uncertainty is whether the structure is a commercial or residential structure. In addition, there are questions about how accurate the hurricane model is when the hurricane model doessince data is unavailable to not distinguish between a structure under construction and a completed structure.determine the percent of completion of construction. Additional information needs to be collected and analyzed in order to calculate an indication for the builders risk policies. A study will be undertaken in the near future to address these issues. SSpecial class items have also been excluded from the analysis. since it accounts for less that 0.7% of the total CNRW premium.Special class accounts for less that 0.7% of the total CNRW premium.

Type of Business	Inforce Premium as of 12/31/2008	2008 Earned House Years
Special Class	$494,313	1,496
Builders Risk	$9,460,039	1,995
All Other CNRW	$61,446,839	42,095

Actual hurricane catastrophic losses are excluded from experience and replaced with expected annual hurricane losses estimated with a catastrophe model. All other work is based on five calendar-accident years of Citizens' experience ending 12/31/2008, and evaluated as of 3/31/2009.

Citizens is required by statute to use the Public Model as the minimum benchmark in determining the windstorm portion of its rates. In some areas of the state, the Public Model produces, on a risk level, higher loss costs than the other Florida-accepted models. This fact, coupled with the Florida Office of Insurance Regulation's (OIR) interpretation of the law prohibiting the blending of models, requires that Citizens based its indications on the Public Model. RMS version 6.0b hurricane model since the Public Model does not produce results for commercial policies.

The overall indication follows the OIR prescribed method as described in its Standardized Rate Indication worksheet. No profit or risk load is included in the expenses. The overall premium level is priced to cover expected non-catastrophe losses and expenses, underwriting expenses, thea residual market contingency provision, FHCF expenses (both mandatory and TICL), and the hurricane average annual loss and other-wind losses. There is no provision for private reinsurance. The hurricane average annual loss is based on Citizens' in-force book of business as of 12/31/2008.

As noted above, there is no provision for private reinsurance included in the expenses for the indication. The funds for purchasing private reinsurance are provided by a 15% Catastrophe Reinsurance Surcharge that is added to all Citizens' policies in the HRA. This surcharge is the result of Orders 15131-95-C and 83-RATE-101B. Neither the expenses associated with private reinsurance nor the funds generated by this surcharge are included in the indication. Two overall indications are calculated: one includes, and the other excludes, the provision for the FHCF cash build-up.

The calculation of new base rates involves separate indications for the hurricane portion of premium, which depends on the estimated expected annual hurricane losses, the hurricane premium in force as of 12/31/2008, and the expense ratio. This document refers to this as the "hurricane indication."

FILING FORMAT

The five twohree main sections of this Actuarial Memo for are:

1. Statewide Indication – This indication is based on the OIR prescribed indication method (RIF). It includes both an a copy of the OIR's RIFstandardized rate indication workbook. that includes the FHCF built-up factor, and an RIF that excludes the FHCF built-up factor. Each supporting exhibit is on a separate worksheet that is named to correspond to the column of the standardized rate indication workbookRIF. Detailed explanation of these exhibits begins on page 678. This file is named **PRWCNRW-Statewide Rate Indication.xls** .

2. Territory Indication – This indication allocates the statewide indicated rate change to each territory. These file includes **CNPRW-Territory Indication.xls** . Detailed explanation of these exhibits begins on page 14.

3. Development of the FHCF Build-up Factor – The FHCF has increased the mandatory premium by 5%. By law, Citizens must recoup this additional charge. This section develops the factor that is applied to the hurricane premium to account for this charge. Detailed explanation of these exhibits begins on page 46. These files include **FHCF Assumptions_PLACLA.pdf** , **FHCF_PLA.pdf** , **CalcFHCFPremium_ExamplePolicies.xls** .

Citizens offers two different policy forms for residential homes in the high risk areas. There is the HW-2 form and the DW-2 form. The forms are very similar. The major differences are that the HW-2 requires owner-occupancy and single or double family dwellings. The DW-2 is used for tenant-occupancy and for dwellings with more then two families. Currently the rates are the same. The on-leveled premium for HW-2 is $422M. The on-leveled premium for DW-2 is $45M. For purposes of this indication, HW-2 and DW-2 data are combined. One indication is calculated for both policy forms. This indication is applied to both forms.

Also included in this filing are two Standardized Rate Indication workbooks that summarize the results.

Individual file names are also listed in table 1 on page 6.

Section	Line of Business	File Name

Table 1: List of files included with filing. See section “Filing Format” on page 5 for more information.

1. STATEWIDE INDICATION

The statewide indication for HO3 HW2CNRW is developed and supported in the excel file **CNRWPRW-Statewide Rate Indication.xls** . The first worksheet is a table of contents that includes the name and description of each exhibit. A copy of the OIR's RIF sheet links directly to the appropriate cells in its supporting exhibits. The exhibit numbers correspond to the column numbers of the RIF.

Trends (Rows (B) thru (D) of the RIF)

The small volume of data makes estimating premium and loss trends difficult. Instead, trends are taken from filed indications for corresponding multi-peril personal commercial residential lines indications. The projected hurricane indications loss ratio does not depend on the premium or loss trends, since the hurricane loss and expense ratios are all estimated as a percent of the projected hurricane losses and on-leveled premium of policies inforce as of 12/31/2008. So long as estimatedince the hurricane losses dominate the loss ratio, the overall indication is not sensitive to the premium and loss trends selections either.; this turns out to be the case for HW2/DW2, and MW2/MD1.

On-Level FactorsEarned Premiums at Current Rate Level (Column (64) of the RIF)

On-level factors are estimated by territory using the parallelogram method as shown in exhibits "Statewide on-level" through "CRL MW4C".**Worksheet 4A** develops the statewide premium on-level factors using the parallelogram method.

Worksheet 4B applies the premium on-level factors to the historical earned premium **to** find the earned premium at current rate level.

Actual Incurred Losses and ALAE (Columns (97) thru (159) of the RIF)

Entries in the RIF represent unadjusted historically incurred losses and ALAE. Most are listed in the "hurricane catastrophes" category since they are for policies that cover only the wind peril.

Actual Incurred ALAE (Columns (11) thru (13) of the RIF)

Entries in the RIF represent unadjusted historically incurred ALAE. Most are listed in the "hurricane catastrophes" category since they are for policies that cover only the wind peril. The hurricane indication lists only unadjusted incurred losses and ALAE due to the hurricane peril.

Incurred ULAE (Columns (1715) thru (19) of the RIF)

The numbers that appear ion columns (1715) thru (19) of the RIF are developed in worksheets 17-19 HW215A and 15B, 17-19 HW4, etc..

Worksheet 17-195A develops the ratio of total paid LAE to paid losses using numbers directly from the Homeowner Schedule P.

Worksheet 157-19B HW2, etc finds the incurred ULAE, and then divides it into hurricane, non-hurricane catastrophe, and non-catastrophe components.

Due to the nature and additional expense of dealing with a large number of claims after a large storm, this worksheet distinguishes between hurricane and non-hurricane ULAE. A 12/31/2005 reserve analysis reports the ratio of the 2005 claim department expense plus the other A&O expenses to paid losses in 2005 was 6% for catastrophes, and was 2.14% for non-catastrophes. Based on this, the ratio of hurricane ULAE to hurricane losses is selected to be three times the ratio of non-hurricane ULAE to non-hurricane losses.

The ratio of non-hurricane ULAE to non-hurricane losses is determined as follows:

$H_{ULAE\%}$ = Ratio of Hurricane ULAE to Hurricane Losses
$NH_{ULAE\%}$ = Ratio of Non-Hurricane ULAE to Non-Hurricane Losses
H_{IL} = Hurricane Paid Losses
NH_{IL} = Non-Hurricane Paid Losses
$TOTAL_{ULAE}$ = Total Paid ULAE

$$H_{ULAE\%} * H_{IL} + NH_{ULAE\%} * NH_{IL} = TOTAL_{ULAE}$$

Substitute in the selection that $H_{ULAE\%} / NH_{ULAE\%} = 3$ gives:

$$3NH_{ULAE\%} * H_{IL} + NH_{ULAE\%} * NH_{IL} = TOTAL_{ULAE}$$

$$NH_{ULAE\%}\ (3H_{IL} + NH_{IL}) = TOTAL_{ULAE}$$

Projected Non-Hurricane Catastrophes (Columns (2217) thru (2419) of the RIF)

The numbers that appear on columns (2217) thru (2419) of the RIF are developed in worksheets 2217-24A19A, 1722-1924B, and 1722-1924C.

For CNPRW, Tthere is insufficient data to project non-hurricane catastrophe losses directly. So, n, or using non-catastrophe losses. Instead, non-hurricane catastrophe losses are assumed to be some fixed fraction of estimated expected annual hurricane losses,. Using the CPRM multi-peril indication, we estimate the ratio of non-hurricane catastrophe losses to hurricane losses. This ratio is then applied to the CNPRW expected hurricane losses to determine the projected non-hurricane catastrophe losses.   and this fraction is estimated from the filed PRM multiperil indication, which does estimate non-hurricane catastrophe losses as a fraction of non-catastrophe losses. For the RIF, this fraction is multiplied by the projected hurricane loss ratio, and by the projected premium for a given accident year.

Worksheet 2217-1924A estimates the non-hurricane catastrophe losses as a fraction of estimated expected annual hurricane loss, using projected hurricane loss & LAE ratios, and projected non-hurricane catastrophe loss & LAE ratios from filed personal commercial residentiallines multi-peril indications.

Since this indication is combining the HW-2 and DW-2 forms, the appropriate numbers from the multi-peril homeowner and dwelling forms are being combined. Where appropriate, Mmultiple lines may beare averaged using the projected 2008 premium to determine overall ratio of non-hurricane catastrophe losses to hurricane losses.. Only the PRM wind-only policies are used to estimate this ratio.

The **58**41.9**2**% projected hurricane loss and LAE ratio for HO3CRM comes directly from Exhibit 11, ColumnRow (19) of the wind-only RIF in the CPRM HO RIF Individual fileStatewide Rate Indication (from the commercial residential multi-perilHO multi-peril filing). The numbers shown for the other lines of business in this column come from the same column in the appropriate PRM RIF.

Column (2) is the non-hurricane catastrophe loss ratio from the CPRM RIF. The **0**2.4% for HO3CRM is calculated by taking the total projectedexpected non-hurricane catastrophe loss and LAE number from Columns (2517) thru (19) of the CRM RIF wind-only RIF in the PRM HO RIF Individual file and dividing by the total projected earned premium from Column (86) of the same RIF. The numbers shown for the other lines of business in this column come from the same column in the appropriate PRM RIF.

Column (3) is the ratio of Column (2) and Column (1). This is the ratio of non-hurricane cats to projected hurricane losses.

Columns (4) through (9) calculate the appropriate weighted average of this number to be used in the PRW filings. For example, since HW-2 and DW-2 data is combined for the indication, HO3, DP3, & DP1 data is combined in determining this factor of non-hurricane cats to hurricane losses.

Worksheet 1722-1924B Non-hurricane catastrophe loss, alae, and ulae as a fraction of loss and LAE are estimated using historical losses, ALAE and ULAE The ratio determined in worksheet 1722-1924A includes losses and LAE. For purposes of the RIF, this number needs to be separated into loss, ALAE, and ULAE components. This worksheet uses the historical CNPRW losses, ALAE, and ULAE to accomplish this. Note that the . The ffinal indication does not depend on these fractions in any way.

Worksheet 1722-1924C The non-hurricane catastrophe loss, ALAE and ULAE ratios are estimated using the projected hurricane loss ratio multiplied by the estimated fractional relationship between hurricane and non-hurricane catastrophe losses and LAE estimated in worksheet 1722-1924A, and by the loss, ALAE or ULAE fractions estimated in worksheet 1722-1924B.

Premium In-force AT C.R.L - Column (28) of the RIF

Add something later about rerating…The extension of exposures method was used to determine the on-leveled premium in this column. Exhibit 30-32C displays the inforce premium that would have been calculated using a parallelogram type method. The premiums are within -.5% of each other.

Project Hurricane Loss and expenses – Columns (3020) thru (232) of the RIF

Worksheet 230-232A calculates the hurricane ALAE and ULAE as a fraction of losses based on experience. MUST PUT NOTE ON 2006, 2008 HURRICANE LOSSES.

Worksheet 230-232B calculates the projected hurricane loss and LAE ratio for all commercial non-residentialpersonal lines wind-only policies (excluding builders risk and special class). Modeled average annual hurricane losses are directly from the PublicRMS version 6.0bRMS Mmodel.

Worksheet 230-32C 22C displays the actual in-force premiumprojected hurricane loss, ALAE and ULAE for each calendar year based on the ratios developed in worksheets 20-22A and 20-22B.. MUST ADD THIS.
Column (4) shows the results of applying the extension of exposures method to the inforce premium.

Columns (7) through (10) calculate the on-leveled premium but manually adjusting each policy that was written before the 4/1/2008 wind mitigation filing. This is the only filing that would have impacted the inforce premium as of 12/31/2008.

Column (11) shows the difference between the premium calculated via the extension of exposures versus manually accounting for the rate impact. As expected, these numbers are very close.

Loss Development Factors – Column (3525) of the RIF

Worksheet 35A 25A Worksheet 25 estimates the loss development factors based on all HRA wind-only policies. Total HRA policies were used so that there would be enough data for credibility purposes. The losses and LAE are evaluated as of 12, 24, etc months. Factors for 15, 27, etc are interpolated from these numbers. Note that the 2004 and 2005 hurricanes as well as Tropical Fay are excluded from the triangles. Triangles with HRA losses and LAE and all catastrophes removed as of 15, 27, etc are not readily available. There are methods in place that will allow Citizens to produce these triangles in the future. Note that final indications only depend on these factors in so far as the non-catastrophe loss ratio is significant to the total loss ratio. The final indication is not sensitive to the selection of these factors.
estimates the loss development factors based on all HRA wind-only policies. Final indications only depend on these factors in so far as the non-catastrophe loss ratio is significant to the total loss ratio. Hurricane base rates are increased based on the hurricane indication, which does not depend on the loss development factors at all.

Accident Year Weights – Column (3344) of the RIF

Due to larger fluctuations in the losses for CNPRW compared to CPRM, each year is weighted equally. Hurricane base rates are increased based on the hurricane indication, which does not depend on the accident year weights.

Expense Provisions – Columns (3547) thru (3649) of RIF

Worksheet 47-48A estimates the net cost of the mandatory FHCF reinsurance. Row (1) shows the estimated mandatory FHCF reinsurance premium before the impact of the 2009 statutory changes. The FHCF premium is based on policies inforce as of 12/31/2008 and was provided by Benfield. The attached file supports this calculation. Rows (2) through (5) are based on information contained in the FHCF ratemaking report and are used to calculate the dollar cost of the FHCF mandatory layer in column (6). Column (8) shows this dollar cost as a percent of inforce premium. Columns (9) through (12) calculate the cost of the FHCF mandatory layer after the impact of the 2009 statutory changes.

Worksheet 47-48B estimates the net cost of the TICL FHCF reinsurance. Row (1) shows the estimated $10 billion TICL FHCF reinsurance premium before the impact of the 2009 statutory changes. The FHCF premium is based on policies inforce as of 12/31/2008 and was provided by Benfield. Rows (2) through (5) are based on information contained in the FHCF ratemaking report and are used to calculate the dollar cost of the FHCF TICL layer in row (6). Row (8) shows this dollar cost as a percent of inforce premium. Rows (9) through (12) calculate the cost of the FHCF TICL layer after the impact of the 2009 statutory changes.

Worksheet 3547-3648B estimates Other Acquisition Expenses, General Expenses, and Taxes Licenses and Fees. The expense selection is based on only the most recent year, rather than on some average of the past 5 years. For Other Acquisition and Taxes, and for Licenses and Fees, this makes little difference because the historical average is practically equal to the most current year. However for General Expense, the difference between the historical average and the most recent year is significant at 1.3%. The ratio from the most recent year is selected based on the belief that it better reflects the future expenses in 2010. This is because Citizens has seen significant infrastructure growth over the past couple of years, and because, relative to the past, depopulation and rate decreases associated with increased wind mitigation credits should decrease Citizens future total premium, which would increase the ratio of General Expenses to premium in 2010.

Note that the selected taxes, licenses, and fees ratio is **2.6811%**. On the RIF, **1.75%** is included for Premium taxes and 2.6811%-1.75% = **.9336%** is included for Misc. Licenses and Fees.

The 1.75% premium tax provision is appropriate, even though there is a Tax-Exempt Surcharge of 1.75%. The source of this surcharge is Florida Statute 627.351(6)(n)2 as shown below:

"In addition to the rates otherwise determined pursuant to this paragraph, the corporation shall impose and collect an amount equal to the premium tax provided for in s. 624.509 to augment the financial resources of the corporation."

Citizens' interpretation of this statute is that the tax-exempt surcharge should be added on top of rates that are actuarially sound. The base rates, which need to be actuarially sound, would include a provision for premium taxes. The tax-exempt surcharge would then be collected to augment the financial resources of the corporation (as dictated by the statute shown above). If Citizens did not include a provision for premium taxes in its calculation of its base rates (and instead relied solely on the tax-exempt surcharge), then the financial resources of Citizens would not be augmented. This would be contrary to the above statute.

Commission Rate

The commission rate is 1014%.

Residual Market Contingency Provision

For the category of Other Expense from column (346) of the RIF, Citizens has included an expense load for a residual market contingency provision. Contingency provisions are well documented in the actuarial literature. According to Actuarial Standard of Practice No. 20, titled "Treatment of Profit and Contingency Provisions and the Cost of Capital in Property/Casualty Insurance Ratemaking":

> ***"The actuary should include a contingency provision if the assumptions used in the ratemaking process produce cost estimates that are not expected to equal average actual costs, and if this difference cannot be eliminated by changes in other components of the ratemaking process.***
> ***While the estimated costs are intended to equal the average actual costs over time, differences between the estimated and actual costs of the risk transfer are to be expected in any given year. If a difference persists, the difference should be reflected in the ratemaking calculations as a contingency provision. The contingency provision is not intended to measure the variability of results and, as such, is not expected to be earned as profit."***

The idea is that a contingency provision can be used to account for potential losses (that are expected to be incurred in the future) that are not necessarily being captured by the historical loss experience that forms the basis of the underlying rate analysis. A contingency provision can sometimes be used to account for potential "new" sources of losses that have not typically been seen in historical loss experience.

There are reasons why a contingency provision would be appropriate. Two (of many) such reasons are:

• The hurricane loss models do not account for all losses associated with a hurricane. Insured losses such as loss assessment, food spoilage, and Law/Ordinance coverage are not given any consideration in the indication.

• As a residual market entity, Citizens has limited control over the types of risk that they insurer. As such, it is possible that future business insured by Citizens might be worse than what its historical experience would otherwise indicate. A contingency provision would help account for this issue.

For a concrete example for the need of a contingency load, consider the following:

In 2007, Citizens calculated a HO3 rate indication, with an assumed effective date of 1/1/2008. Using data from 2002 thru 2006, a non-cat normal loss and LAE ratio of 44% was projected for policy period 1/1/2008 thru 12/31/2008. From column (43) of the RIF displays the accident year 2008 ultimate loss ratio based on actual data as of 3/31/2009. The updated projection is a loss ratio of 69.4%. Granted that this is not a perfect comparison as the time periods are not exactly the same. The 44% projection is for the policy period 1/1/2008 thru 12/31/2008 while the 69.4% is for calendar/accident year 2008. But clearly, based on all available data as of 3/31/2007, the projection loss ratio for 2008 was understated. In this case, the differences can, at least partially, be attributed to the change in wind mitigation credits, worsening of sinkhole results, and the impact of depopulation (i.e. cherry-picking by the take-out companies). The point is that there is the possibility of unpredictable events or changes in circumstance that cause loss ratio projections to be off the mark. A contingency load is used to mitigate these possibilities.

We have selected a contingency load of 10. Given the information above these selections are probably on the low side. At some point in the future, these selections should be re-evaluated and possibly increased.

<u>Credibility</u>
The base rates are increased based on the hurricane indication, which is assumed to be 100% credible since it uses only modeled average annual hurricane loss.

Inforce Premiums at Current Rate Level

In Appendix A, Pages 1 thru 5 we calculate the inforce premium at current rate level as of 12/31/2008. The last rate change for CNRW policies was effective 2/1/2008. First, we determined the total inforce premium excluding surcharges as of 12/31/2008 separated by territory and construction due to policies written before 2/1/2008. Then, we determined the total inforce premium excluding surcharges as of 12/31/2008 separated by territory and construction for policies written after 1/31/2008. Next, we applied the rate change effective 2/1/2008 to the inforce premium for policies written before 2/1/2008. Finally, we summed this amount with the premium written after 1/31/2008 to determine the inforce premium at current rate level.

2. TERRITORY INDICATION

The combined statewide indication is allocated to territory to determine the overall rate need for a territory. It is contained in the excel workbooks named **CNPRW- Territory Indication.xls**.

TABLE OF CONTENTS

EXPLANATION OF TERRITORIAL EXHIBITS

Exhibits **E1,P1 – E2,P3** find the indicated total rate change by territory, off-balanced to the statewide total rate increase. Exhibits **E3,P1 – E3,P5** show the current base rates for CNRW policies. Exhibits **E4,P1 – E4,P5** calculate new base rates from the indicated rate changes.

Territorial Estimated Expected Loss and LAE

E1,P1 shows each territory's expected annual hurricane loss estimated using the RMS version 6.0b RMS Mmodel. The results have not been adjusted in any way. The LAE ratio is assumed to be identical in every territory.

Premiums at Current Rate Level In Force as of 12/31/2008

E1,P2 calculates for each territory a total loss/LAE ratio. There is a hurricane portion, a non-hurricane catastrophe portion, and a non-catastrophe portion.

Column (1) displays the on-leveled in-force premium. Column (2) displays the modeled hurricane loss and LAE from exhibit E1,P1. Column (3) is the hurricane loss and LAE loss ratio. This is the ratio of Column (2) and Column (1). This is the hurricane portion.

Column (4) is one plus the non-hurricane catastrophe loss/LAE to hurricane loss/LAE ratio from exhibit 17-19C from the statewide indication. This factor will be applied to the hurricane portion to account for the non-hurricane catastrophe portion.

This Column (5) is the non-catastrophe loss ratio. It is the ratio of the non-catastrophe losses from column (27) of the RIF divided by the premium from column (6) of the RIF.

Column (6) compiles columns (3), (4) , & (5) to calculate the total loss ratio by territory.

Column (7) is the hurricane loss/LAE relativity. This is Column (3) divided by the total of Column (3).

Expense ratios

E2,P1 calculates the fixed and variable expense provision for each territory. Of the expenses, only the residual market contingency is assumed to vary by territory (as a percent of premium.) The residual market contingency provision provides in part for non-modeled losses. These are assumed to be greater in areas with larger hurricane losses, so the residual market contingency provision is assumed to vary by territory in proportion to that territory's hurricane loss ratio relative to average. Another purpose of the residual market contingency provision is to mitigate the larger variance between expected results and actual results. This also varies in proportion to expected hurricane losses.

Columns (1) and (2) come directly from exhibit E1,P2.

Columns (3) through (7) are statewide expense provisions that come directly from the statewide indication.

Column (8) uses the hurricane loss relativity from Column (2) to vary the residual market contingency by territory.

Column (9) is the sum of columns (4), (5), & (7).

Column (10) is the sum of columns (3), (6), & (8).

Indicated Total Rate Change

In **E2, P2** each territory's indicated total rate change is calculated from its loss and expense ratios. These rate changes are off-balanced to the statewide indication.

Column (5) is the raw, unadjusted indication, based on the total loss ratio from E1,P2, Column (6) and the expense provisions from E2,P1, Columns (9) & (10).

Column (6) is Column (5) capped below at -20% and capped above at 80%. Without these caps, the indications would range from -33% to 40712%. The purpose of the caps is to maintain stability while being responsive to the indications. The -20% and 80% caps reasonably accomplish this goal.

Based on the outcome of the current legislature session, all rate increases are to be capped at 10%. Both indicated increases and decreases are capped at this amount. The capped indicated rate changes can be seen in column (10).

Current Base Rates

In E3,P1 thru E3, P**5** we show the current base rates for the CNRW program. Each of the five pages corresponds to a different rating table.

Description of Rating Tables

Rating Table	Brief Description
CC-D	Motels and hotels with one story
DD-E	Motels and hotels over one story
CC-F	All other commercial buildings not included in the other rating tables (i.e. offices, mercantile, parking garages, banks, restaurants, churches, grocery stores, etc.)
CC-G	Nursing home, dormitories, sorority and fraternity houses, boarding houses
CC-H	Commercial mobile homes

Each rating table contains separate base rates for buildings and contents that vary by territory and type of construction.

Proposed Base Rates

In **E4,P1** thru **E4, P5** we show the indicated base rates. The indicated base rates were calculated by applying the indicated territory rate changes to the contents and buildings base rates for each type of construction.

RULE/MANUAL CHANGES

Citizens Commercial Wind-Only Manual provides rules for both the Commercial Residential and Commercial Non-Residential lines of business. As a result, some changes made in the manual are not applicable to Commercial Non-Residential. An overview of the key rule changes for Citizens Commercial Non-Residential Wind-Only is provided below. A detailed schedule of all manual amendments is included in a separate Summary of Changes document.

Rate Tables
The Commercial Non-Residential base rate tables for buildings and contents have been amended to reflect the proposed rate changes.

Coverage Limits
For Commercial Non-Residential we have amended the rule to clarify that the $1,000,000 limit applies per insured per location.

Policy Changes Rule
For Commercial Non-Residential we have added a provision to clarify that a policy may not be cancelled and rewritten to circumvent rate, rule, coverage or surcharge changes.

The Citizens Commercial Wind-Only Manual pages have been amended to reflect the changes noted above with an edition date of 01/2010.

Explanation of Territorial Exhibits
Exhibits **E1,P1** – **E2,P3** find the indicated hurricane rate change by territory, off-balanced to the statewide hurricane rate increase. There is a version of each exhibit for each policy form, e.g. there is **HW2 E1, P1** , **HW4 E1, P1** , **HW6 E1, P1**, etc. Because there is not enough experience to estimate the non-hurricane indicated change directly, it is assumed to be a judgmentally selected fraction of the hurricane indicated change. Exhibit **E3, P1** calculates new base rates from the indicated rate changes.

Territorial Estimated Expected Loss and LAE

E1, P1 shows each territory's expected annual hurricane loss estimated using the Public Model. The results have not been adjusted in any way. The LAE ratio is assumed to be identical in every territory.

Premiums at Current Rate Level In Force as of 12/31/2008

E1, P2 calculates for each territory the ratio of the expected hurricane loss and LAE to the hurricane portion of the premium.a total loss ratio. The premium is at current rate levels using the extension of exposure technique. The hurricane portion of the premium is used because these loss ratios are ultimately used to adjust the hurricane base rate.

Expense ratios

E2, P1 estimates each territory's fixed and variable expense component as a percent of the hurricane portion of premium. Of the expenses, only the cost of FHCF reinsurance and the residual market contingency is assumed to vary by territory (as a percent of premium.) Since the cost of FHCF reinsurance is closely tied to hurricane losses, it is assumed to vary by territory in proportion to that territory's hurricane loss ratio relative to average. The residual market contingency provision provides in part for non-modeled losses. These are assumed to be greater in areas with larger hurricane losses, so the residual market contingency provision also varies by territory.

Indicated Hurricane Rate Change

In **E2, P3** each territory's indicated hurricane rate change is calculated from its loss and expense ratios. These rate changes are offbalanced to the statewide indication.

New Base Rates

E3, P1 applies the indicated rate change to find new base rates. Indicated hurricane rate changes are capped at an increase or decrease of 10%. JUSTIFICATION NEEDED. The average rate increases proportionally with the base rate, so that an indication of X% leads to a base rate increased by X%.

Other Wind Base Rates

Because there is not enough experience to estimate the non-hurricane indicated change directly, it is assumed to be a judgmentally selected fraction of the hurricane indicated change. Our judgment is influenced by exhibits 7, pages 1-3 in the statewide indication.

E7,P1 shows the indicated rate change for the non-hurricane portion of the premium as a fraction of the indicated hurricane rate change. This depends only on the non-catastrophe and non-hurricane losses. The non-catastrophe losses in general have large fluctuations due to limited data, and their development and trending may be biased due to differences between multiperil and wind policies, and between different wind-only policy types.

E7,P2 shows the indicated rate change for the non-hurricane portion of the premium as a fraction of the indicated hurricane rate change with all non-catastrophe losses excluded. Since the non-hurricane catastrophe losses are estimated as a fraction of the expected hurricane losses, there is no stochastic uncertainty, but the fraction may be significantly biased. In any case, excluding all non-catastrophe losses certainly causes the indication to be underestimated.

E7,P3 shows how the indicated rate change for the non-hurricane portion of the premium as a fraction of the indicated hurricane rate change varies with the selected fraction of non-hurricane catastrophe losses to hurricane losses. All non-catastrophe losses are excluded. The x-axis shows the ratio as a fraction of the PRM value, ie as a percent of the value used for the actual indication. The y-axis shows the ratio.

HW2:
For HW2, the indicated other-wind increase is at least equal to the hurricane increase so long as the non-hurricane catastrophe losses are at least 65% of the expected hurricane annual losses. For HW2, we set the non-wind indicated equal to the hurricane indication.

OTHER LOBS LATER

3. DEVELOPMENT OF THE FHCF BUILD-UP FACTOR

The FHCF has increased the mandatory premium by 5%. By law, Citizens is required to recoup this additional charge. This section develops the factor that is applied to the hurricane premium to account for this charge.

To develop the FHCF Built-up factor, the following calculations were made:

Estimate the amount of premium that will be payable to the FHCF for the mandatory layer (prior to increase in rate).
Determine 5% of (1)
Estimate the amount of hurricane premium projected for 2010
Divide (2) by (3)

Following the above calculations, the FHCF built-up factor for HO3 is **.89%.** This number will be applied to the hurricane portion of premium.

For support of Benfield's estimate, see the access data base **FHCF_PRM**. This contains the policy level detail used to estimate the FHCF mandatory premium. Also see PDF file FHCF **Assumptions_PLACLA** for explanation of the assumptions. And excel file **ExamplePolicies** has examples of how the premium was calculated.

For support of the hurricane premium projection [(3) above], see excel file **Estimated Hurricane Premium.xls** . This calculation is done on a territory basis. First the 2010 total premium is projected, using proposed rates changes. Then the existing hurricane percent is applied to the projected total premium to determine the hurricane premium.

For the actual calculation outlined above, see excel file **Summary of FHCF Built-up Factors.**

Office of Insurance Regulation

Bureau of Property & Casualty Forms and Rates

FLORIDA EXPENSE SUPPLEMENT FOR INDEPENDENT RATE FILINGS

COMPANY NAME **Citizens Property Insurance Corporation** **DATE** **10-06-2009**
(GROUP)

1) Combination to which this page applies **Commercial Non-Residential Wind Program**
(Line, Subline, Coverage, Territory, Class, etc.)

2) Development of Expected Loss Ratio. (Attach exhibit detailing insurer expense data and/or other supporting information.)

A. Commission and Brokerage	**14.0 %**
B. Other Acquisition	**0.4 %**
C. General Expense	**5.3 %**
D. Premium taxes	**1.75 %**
E. Miscellaneous licenses and fees, other taxes	**0.36 %**
F. Other expenses	**10.0 %**
G. Expected Profit Margin & Contingency Factor (per Florida Rule 690-170.003)	**0.0 %**
H. TOTAL (Expected Expense Ratio)	**31.8 %**

3) Expected Loss Ratio: ELR = 100% - 2H = **68.2 %**

4) Current Number of Policies in Force: **30,888**

5) Florida Rate Filing History:

	Rate Change Requested	Rate Level Indication	Latest Calendar/Accident Year Incurred Loss Ratio	Latest Calendar/Accident Year Earned Premium Volume	Rate Change Approved	New Bus. Effective Date	Renewal Effective Date
New Filing	9.9 %	123.6%	165.2 %	$ 59,293,557	____%	1/1/2010	1/1/2010
1st Prior Filing	____%	____%	____%	$____	____%	____	____
2nd Prior Filing	____%	____%	____%	$____	____%	____	____

OVERALL INSTRUCTIONS

For completing the Standardized Rate Level Indications Form (SRLI)

(a) This spreadsheet workbook handles any one of the following "Product Types" in different tabs:

Commercial Automobile Liability
Commercial Automobile Physical Damage
Commercial Other Liability
Medical Malpractice
Commercial Property
Commercial Indivisible Pkg (BOP/Businessowners)
Other Lines - 5 years of data (Personal Inland Marine, Service Contracts, etc)
Other Lines - 10 years of data (Personal Umbrella, Misc. Liability, etc)

Choose the appropriate Product Type for your line of business review.
Also choose the appropriate Sub Product Types when it is applicable.

(b) **All monetary values entered into the spreadsheet are to be reported in the nearest dollars.**

(c) Input cells are shown in connection with the color: **Green**, **Purple**, and **Blue**
Green input cells are dollar value;
Purple input cells are the accident years/dates entered into the SRLI Form;
Blue input cells represent all other inputs;
All cells that are not blue, green or purple cannot be modified by the user.

(d) "**(SUPPORT!)**" appears in color **RED**
Whenever the red designator "(SUPPORT!)" appears next to an item, you are REQUIRED to provide for that item a detailed derivation with appropriate supporting data in an uploaded separate document. (Also, whenever dollar amounts are estimated or allocated amounts rather than actual amounts, you are REQUIRED to do the same.)

(e) If you need more Standardized Rate Level Indication forms, add a copy of the necessary sheet within this workbook after (and adjacent to) the original sheet. Make sure that the copied worksheets are labeled as copies (i.e. with suffix (2), (3), etc.)"

P R O D U C T - S P E C I F I C   I N S T R U C T I O N S

For completing the Standardized Rate Level Indications Form (SRLI)

INSTRUCTIONS SPECIFIC TO THE PRODUCT LINES:

(a) Separate rate level indications and accompanying support on a statewide basis must be provided by each subproduct unless all subproducts bear the same uniform statewide changes. For those subproducts that do bear uniform statewide changes, combined rate level indication and support for such indication must be provided.

(b) Rate level indications and supporting data must be provided for each subproduct if different rate changes are being requested for one or more of the subproducts within the main program.

(c) **The accident years used can end on December 31 or any other day of the year but must be 12 months in length. Accident Year Ending Date must be within twelve (12) months from the date the filing is submitted to the OIR. Loss Evaluation Date must be within last nine (9) months from the date the filing is submitted.**

(d) **Partial accident years will not be accepted.**

(e) For Commercial Property and CMP lines of business and absent any supporting data/information to the contrary, the OIR will conclude that each rate level indication is included in a range whose maximum is the rate level indication and whose minimum is the rate level indication adjusted to eliminate profit & contingencies and investment income.

(f) If net cost of reinsurance is included in the rate indication, refer to Rule 69O-170.0142 F.A.C. That is, it must consider the amount to be paid to the reinsurer, expected reinsurance recoveries, ceding commissions to be paid to the insurer by the reinsurer, and other relevant information specifically relating to cost such as a retrospective profit sharing agreement between the insurer and the reinsurer. All reinsurance treaties applicable to the filing must also be submitted as support.

(g) For Commercial Residential risks, if you are not recouping the reimbursement premiums you paid to the Florida Hurricane Catastrophe Fund (FHCF), the cost of reinsurance must include the "FHCF Reins. Cost" and the "Non-FHCF Reins. Cost". Supporting data must be provided separately for each of these elements and the tax-exempt status of the FHCF must be included. Also included in the supporting data must be a chart showing the attachment points of all the various layers of reinsurance including the FHCF reinsurance and support for each attachment point. This chart must clearly demonstrate that other reinsurance does not duplicate the coverage provided by the FHCF.

(h) For Commercial Residential risks, if you are recouping the reimbursement premiums you paid to the FHCF separately, the cost of reinsurance must not include the "FHCF Reins. Cost". Also, you must exclude the expected hurricane losses and loss adjustment expenses covered by the FHCF in the calculation of your rate level indications and you must exclude the reimbursement premiums collected from your policyholders in the calculation of your rate level indications. However, you must still provide the expected Hurricane loss and loss adjustment expenses losses covered by the FHCF and the reimbursement premiums you paid to the FHCF along with supporting data for these amounts. Finally, you must still provide a chart showing the attachment points of all the various layers of reinsurance including the FHCF reinsurance and support for each attachment point. This chart must clearly demonstrate that other reinsurance does not duplicate the coverage provided by the FHCF.

(i) For Commercial Property and CMP lines of business with both Commercial Residential and Non-Residential data, separate rate indications must be provided for Non-Residential and Residential risks. Do not pool the data for the rate indication.

(j) The use of contingent commissions as supporting data for rate changes is prohibited unless there is a contractual arrangement between the insurer and its agents concerning the payment of contingent commissions and the insurer demonstrates that it is not paying contingent commissions from profits higher than anticipated in its filings.

(k) Data should be consistent with scope of program, excluding punitive damage awards, individually rated risks, consent-to-rate risk, and excess rated risks, etc.

(l) All rate level indications included in a filing must comply with the requirements included in this Standardized Rate Level Indications Form.

(m) Program name(s) must be consistent with those shown in the Rate Collection System (RCS).

(n) Separately provide the following, if applicable:

(1) An exhibit that lists your rate level history and includes an explanation of the calculation of the "Current Rate Level Factors"
(2) Supporting data for the selected "Annual Premium Trend" and "Exposure Trend"
(3) Your definition of non-hurricane catastrophe losses
(4) An explanation of the derivation of the "INCURRED ULAE" amounts along with supporting Florida data.
(5) Supporting data for the selected "Annual Loss Trend (Up-to-Date)" and the "Annual Loss Trend (Projected)"
(6) Supporting data for the selected "Loss & ALAE Development Factors"
(Include Florida-only historical Loss & ALAE data consistent with the "ACTUAL INCURRED LOSSES Excl. Cats." and the "ACTUAL INCURRED ALAE Excl. Cats." included in the indications)
(7) Detailed supporting data for the "PROJECTED NON-HURR. CAT." amounts
(8) Detailed supporting data for the "Projected HURRICANE Losses, ALAE, and ULAE" amounts.
For Commercial Residential risks, the "Projected HURRICANE Losses" must be from a model accepted by the Florida Commission on Hurricane Loss Projection Methodology and may not be modified or adjusted.
(9) Supporting data for the "Selected Accident Year Weights"
(10) Supporting data for the selected "Credibility". Note - Support must include the credibility methodology and full standard used to derive the credibility. Actuarial support must also include the actuary's opinion on why such methodology and full standard are appropriate for the rate indication for this line of business.
(11) Supporting data for the selected "Fixed Expense Loading" by category including the latest three years of historical data if available
(12) Supporting data for the selected "Variable Expense Loading" by category including the latest three years of historical data if available
(13) Supporting data for any "Adjustment Factor for Law Changes, Etc." other than 1.000
(14) Supporting data and exhibits where indicated with "**(SUPPORT!)**" not mentioned above

(o) The selected "Profit & Contingency" expense loading must be in compliance with Rule 69O-170.003, F.A.C.

(p) No expense loadings should be included for Florida Insurance Guaranty Association assessments, Citizens Property Insurance Corporation assessments, Florida Hurricane Catastrophe Fund premium payments, or Managing General Agent fees.

(q) The "Expense Loading" by category must be consistent with the expense loadings shown in the Premium Breakdown Section of the RCS submission and on the OIR-B1-595 or OIR-B1-583 Forms.

(r) Fill out and resubmit the Standardized Rate Level Indications Form (SRLI) to the OIR without any alternation or modification to the Form. Any alternation will render this Standardized Rate Level Indications Form (SRLI) to be incomplete and will require correction and resubmission.

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F O R M U L A S   A P P E A R I N G   I N   R A T E   L E V E L   I N D I C A T I O N S   F O R M

FOR COMMERCIAL AUTO, OTHER LIABILITY, MEDICAL MALPRACTICE, AND OTHER LINES (10 YEARS)

(Informational Purposes Only)

(5) =[1.00 + (B)] ^ {[(E) - (1)] / 365.25 + 0.50}

(6) =(4) x (5)

(9) =(7) + (8)

(11) =(9) + (10)

(12) =(11)

(14) =[1.00 + (C)] ^ {[{Last entry in (1)} - (1)] / 365.25} x [1.00 + (D)] ^ {[(H) - {Last Entry in (1)}] / 365.25 + 0.50}

(15) =(12) x (13) x (14)

(16) =(15) ÷ (6)

(18) =(16) x (17) ; Total is weighted by col (6).

(19) =(Optional) Company selected weights. Actuarial support required. The weights must add to 100%.
Note: Once this option is selected, company must apply these same weights to all subsequent indications.

(20) =(Optional) Sumproduct of (18) and (19)

(21) =Fixed Expenses (support must be provided with at least 3 years of data)

(22) =Variable Expenses (support must be provided with at least 3 years of data)

(23) =(21) + (22) Expenses must be equal to those reported in the OIR-B1-595 or OIR-B1-583 forms.

(24) =The total derived from either (18) or (20)

(25) =Net Cost of Reinsurance. Support must be provided per instruction if applying.

(26) =Total of (21)

(27) =(24) + (25) + (26)

(28) =(27) ÷ [1.00 - Total of (22)] -1

(29) =Credibility. Actuarial support of the credibility methodology used and derivation of the full credibility standard must be provided.

(30) =[1.00 + (D)] / [1.00 + (B)] - 1.00

(31) =The number of year(s) since the last company indicated rate change approved.

(32) =[1.00 + (30)] ^ (31) - 1.00

(^ denotes exponentiation)

(33) =[(28) x (29)] + [(32) x [1.00 - (29)]

(34) =Company selection must be supported if rate change selected is different from indicated (33)

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STATE OF FLORIDA -- OFFICE OF INSURANCE REGULATION
STANDARDIZED RATE LEVEL INDICATIONS FORM

RATE LEVEL INDICATIONS

GROUP NAME:	**ABC Ins. Group**
PRODUCT TYPE:	**COMMERCIAL AUTO LIABILITY**
PRODUCT SUB-TYPE:	**Enter Sub-Product Line**
STATE:	**Florida Experience Only**

PREMIUMS:

(1) Calendar/Fiscal Year Ending	(2) Written Premiums (Dollars)	(3) Earned Premiums (Dollars)	(4) (SUPPORT!) Earned Premiums at Current Rate Level (Dollars)	(5) Exposure/ Premium Trend Factors	(6) Trended Earned Premiums at Current Rate Level (Dollars)
mm/dd/yyyy	$0	$0	$0	1.000	$0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
TOTAL	$0	$0	$0		$0

(A) Loss Experience Eval. Date: (SUPPORT!)	mm/dd/yyyy
(B) Annual Premium Trend: (SUPPORT!)	0.0%
(C) Annual Loss Trend (Up-to-Date): (SUPPORT!)	0.0%
(D) Annual Loss Trend (Projected): (SUPPORT!)	0.0%
(E) Avg. Acc. Date for Proj. Rates: (SUPPORT!)	mm/dd/yyyy

Note:
Refer to Overall and Product Instruction tabs for detailed instructions in filling out this indication workbook.

ACTUAL LOSSES:

(1) Accident Year Ending	(7) --- ACTUAL ACCIDENT YEAR INCURRED LOSSES & AL Paid (Dollars)	(8) Outstanding (Dollars)	(9) Incurred (Dollars)	(10) (SUPPORT!) Actual Incurred ULAE (Dollars)	(11) Actual Incurred Loss & LAE (Dollars)
mm/dd/yyyy	$0	$0	$0	$0	$0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
TOTAL	$0	$0	$0	$0	$0

DEVELOPMENT OF PROJECTED LOSS & LAE RATIO:

(1) Accident Year Ending	(12) Actual Incurred Loss & LAE (Dollars)	(13) (SUPPORT!) Loss & ALAE Develop-ment Factors	(14) Loss Trend Factors	(15) Trended & Developed Incurred Loss & LAE (Dollars)	(16) Trended & Developed Incurred Loss & LAE Ratio	(17) (SUPPORT!) Adjustment Factor for Law Changes, etc.	(18) Final Adjusted Expected Incurred Loss & LAE Ratio	(19) (SUPPORT!) (Optional) Accident Year Weights	(20) (Optional) Weighted Trended & Developed Incurred Loss & LAE Ratio
mm/dd/yyyy	$0	1.000	1.000	$0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
TOTAL	$0			$0	0.0%		0.0%	0.0%	0.0%

IF THIS FILING CONTAINS A PROVISION FOR THE NET COST OF REINSURANCE, INCLUDE AN ADDITIONAL WORKSHEET SHOWING HOW YOU HAVE DETERMINED THE NET COST OF REINSURANCE AND HOW YOU HAVE INCORPORATED THAT COST INTO THIS RATE INDICATION

PROSPECTIVE EXPENSE PROVISIONS (% OF PREMIUM):

Category of Expected Expenses	(21) (SUPPORT!) Fixed Expense Loading	(22) (SUPPORT!) Variable Expense Loading	(23) (SUPPORT!) Total Expense Loading
Commissions	0.0%	0.0%	0.0%
Other Acquisition	0.0%	0.0%	0.0%
General Expense	0.0%	0.0%	0.0%
Premium Taxes	0.0%	0.0%	0.0%
Misc. Licenses & Fees[1]	0.0%	0.0%	0.0%
Profit & Contingency (per 69O-170.003 F.A.C.)	0.0%	0.0%	0.0%
Other Non-Reinsurance Related Expense (Specify[2])	0.0%	0.0%	0.0%
TOTAL EXPENSES	0.0%	0.0%	0.0%
PERMISSIBLE LOSS & LAE			100.0%

[1]Provide a breakdown by type of licenses/fees and no assessments should be included in the provision.
[2]Must provide detail support and explanation
[3]Provide support if number of years since last rate change is greater than 1.00 since this line of business is subjected to annual rate certif

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DEVELOPMENT OF RATE LEVEL INDICATIONS:

(24)	0.0%	Final Projected Incurred Loss & LAE Ratio (Incl Cats)
(25)	0.0%	Net Cost of Reinsurance, If applicable (Optional) **(SUPPORT!)**
(26)	0.0%	Expected Fixed Expense Ratio
(27)	0.0%	Final Proj. Incurred Loss & LAE Ratio (Incl Cats, Fixed Expense, and the Net Cost of Reinsurance)
(28)	**-100.0%**	Company Indication (100% Credible)
(29)	0.0%	Credibility **(SUPPORT!)**
(30)	0.0%	Expected Annual Net Trend (i.e., Projected Loss Trend Net of Exposure/Premium Trend)
(31)	0.00	Number of Years Since Last Rate Change[3] **(SUPPORT!)**
(32)	0.0%	Expected Net Trend Since Last Rate Review (Value receives complement of credibility)
(33)	**0.0%**	**Credibility-Weighted Rate Level Indication**
(34)	**0.0%**	**Company Selected Rate Change (SUPPORT!)**

STATE OF FLORIDA -- OFFICE OF INSURANCE REGULATION
STANDARDIZED RATE LEVEL INDICATIONS FORM

RATE LEVEL INDICATIONS

GROUP NAME:	ABC Ins. Group
PRODUCT TYPE:	COMMERCIAL AUTO PHYSICAL DAMAGE
PRODUCT SUB-TYPE:	Enter Sub-Product Line
STATE:	Florida Experience Only

(A) Loss Experience Eval. Date: (SUPPORT!)	mm/dd/yyyy
(B) Annual Premium Trend: (SUPPORT!)	0.0%
(C) Annual Loss Trend (Up-to-Date): (SUPPORT!)	0.0%
(D) Annual Loss Trend (Projected): (SUPPORT!)	0.0%
(E) Avg. Acc. Date for Proj. Rates: (SUPPORT!)	mm/dd/yyyy

Note:
Refer to Overall and Product Instruction tabs for detailed instructions in filling out this indication workbook.

PREMIUMS:

(1) Calendar/Fiscal Year Ending	(2) Written Premiums (Dollars)	(3) Earned Premiums (Dollars)	(4) (SUPPORT!) Earned Premiums at Current Rate Level (Dollars)	(5) Exposure/ Premium Trend Factors	(6) Trended Earned Premiums at Current Rate Level (Dollars)
mm/dd/yyyy	$0	$0	$0	1.000	$0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
TOTAL	$0	$0	$0		$0

ACTUAL LOSSES:

(1) Accident Year Ending	(7) --- ACTUAL ACCIDENT YEAR INCURRED LOSSES & AL Paid (Dollars)	(8) Outstanding (Dollars)	(9) Incurred (Dollars)	(10) (SUPPORT!) Actual Incurred ULAE (Dollars)	(11) Actual Incurred Loss & LAE (Dollars)
mm/dd/yyyy	$0	$0	$0	$0	$0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
TOTAL	$0	$0	$0	$0	$0

DEVELOPMENT OF PROJECTED LOSS & LAE RATIO:

(1) Accident Year Ending	(12) Actual Incurred Loss & LAE (Dollars)	(13) (SUPPORT!) Loss & ALAE Develop-ment Factors	(14) Loss Trend Factors	(15) Trended & Developed Incurred Loss & LAE (Dollars)	(16) Trended & Developed Incurred Loss & LAE Ratio	(17) (SUPPORT!) Adjustment Factor for Law Changes, etc.	(18) Final Adjusted Expected Incurred Loss & LAE Ratio	(19) (SUPPORT!) (Optional) Accident Year Weights	(20) (Optional) Weighted Trended & Developed Incurred Loss & LAE Ratio
mm/dd/yyyy	$0	1.000	1.000	$0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
TOTAL	$0			$0	0.0%		0.0%	0.0%	0.0%

IF THIS FILING CONTAINS A PROVISION FOR THE NET COST OF REINSURANCE, INCLUDE AN ADDITIONAL WORKSHEET SHOWING HOW YOU HAVE DETERMINED THE NET COST OF REINSURANCE AND HOW YOU HAVE INCORPORATED THAT COST INTO THIS RATE INDICATION

PROSPECTIVE EXPENSE PROVISIONS (% OF PREMIUM):

Category of Expected Expenses	(21) (SUPPORT!) Fixed Expense Loading	(22) (SUPPORT!) Variable Expense Loading	(23) (SUPPORT!) Total Expense Loading
Commissions	0.0%	0.0%	0.0%
Other Acquisition	0.0%	0.0%	0.0%
General Expense	0.0%	0.0%	0.0%
Premium Taxes	0.0%	0.0%	0.0%
Misc. Licenses & Fees[1]	0.0%	0.0%	0.0%
Profit & Contingency (per 69O-170.003 F.A.C.)	0.0%	0.0%	0.0%
Other Non-Reinsurance Related Expense (Specify[2])	0.0%	0.0%	0.0%
TOTAL EXPENSES	0.0%	0.0%	0.0%
PERMISSIBLE LOSS & LAE			100.0%

DEVELOPMENT OF RATE LEVEL INDICATIONS:

(24)	0.0%	Final Projected Incurred Loss & LAE Ratio (Incl Cats)
(25)	0.0%	Net Cost of Reinsurance, If applicable (Optional) (SUPPORT!)
(26)	0.0%	Expected Fixed Expense Ratio
(27)	0.0%	Final Proj. Incurred Loss & LAE Ratio (Incl Cats, Fixed Expense, and the Net Cost of Reinsurance)
(28)	**-100.0%**	Company Indication (100% Credible)
(29)	0.0%	Credibility (SUPPORT!)
(30)	0.0%	Expected Annual Net Trend (i.e., Projected Loss Trend Net of Exposure/Premium Trend)
(31)	0.00	Number of Years Since Last Rate Change[3] (SUPPORT!)
(32)	0.0%	Expected Net Trend Since Last Rate Review (Value receives complement of credibility)
(33)	**0.0%**	**Credibility-Weighted Rate Level Indication**
(34)	**0.0%**	**Company Selected Rate Change** (SUPPORT!)

[1]Provide a breakdown by type of licenses/fees and no assessments should be included in the provision.
[2]Must provide detail support and explanation
[3]Provide support if number of years since last rate change is greater than 1.00 since this line of business is subjected to annual rate certif

Created by: Florida Office of Insurance Regulation (Version 10/08)

STATE OF FLORIDA -- OFFICE OF INSURANCE REGULATION
STANDARDIZED RATE LEVEL INDICATIONS FORM

RATE LEVEL INDICATIONS

GROUP NAME:	ABC Ins. Group
PRODUCT TYPE:	COMMERCIAL OTHER LIABILITY
PRODUCT SUB-TYPE:	Enter Sub-Product Line
STATE:	Florida Experience Only

(A) Loss Experience Eval. Date:	(SUPPORT!)	mm/dd/yyyy
(B) Annual Premium Trend:	(SUPPORT!)	0.0%
(C) Annual Loss Trend (Up-to-Date):	(SUPPORT!)	0.0%
(D) Annual Loss Trend (Projected):	(SUPPORT!)	0.0%
(E) Avg. Acc. Date for Proj. Rates:	(SUPPORT!)	mm/dd/yyyy

Note:
Refer to Overall and Product Instruction tabs for detailed instructions in filling out this indication workbook.

PREMIUMS:

(1) Calendar/Fiscal Year Ending	(2) Written Premiums (Dollars)	(3) Earned Premiums (Dollars)	(4) (SUPPORT!) Earned Premiums at Current Rate Level (Dollars)	(5) Exposure/ Premium Trend Factors	(6) Trended Earned Premiums at Current Rate Level (Dollars)
mm/dd/yyyy	$0	$0	$0	1.000	$0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
TOTAL	$0	$0	$0		$0

ACTUAL LOSSES:

(1) Enter either accident year or report year below: Accident Year Ending	(7) --- ACTUAL ACCIDENT YEAR INCURRED LOSSES & AL Paid (Dollars)	(8) Outstanding (Dollars)	(9) Incurred (Dollars)	(10) (SUPPORT!) Actual Incurred ULAE (Dollars)	(11) Actual Incurred Loss & LAE (Dollars)
mm/dd/yyyy	$0	$0	$0	$0	$0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
TOTAL	$0	$0	$0	$0	$0

DEVELOPMENT OF PROJECTED LOSS & LAE RATIO:

(1) Accident Year Ending	(12) Actual Incurred Loss & LAE (Dollars)	(13) (SUPPORT!) Loss & ALAE Develop-ment Factors	(14) Loss Trend Factors	(15) Trended & Developed Incurred Loss & LAE (Dollars)	(16) Trended & Developed Incurred Loss & LAE Ratio	(17) (SUPPORT!) Adjustment Factor for Law Changes, etc.	(18) Final Adjusted Expected Incurred Loss & LAE Ratio	(19) (SUPPORT!) (Optional) Accident Year Weights	(20) (Optional) Weighted Trended & Developed Incurred Loss & LAE Ratio
mm/dd/yyyy	$0	1.000	1.000	$0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
TOTAL	$0			$0	0.0%		0.0%	0.0%	0.0%

IF THIS FILING CONTAINS A PROVISION FOR THE NET COST OF REINSURANCE, INCLUDE AN ADDITIONAL WORKSHEET SHOWING HOW YOU HAVE DETERMINED THE NET COST OF REINSURANCE AND HOW YOU HAVE INCORPORATED THAT COST INTO THIS RATE INDICATION

PROSPECTIVE EXPENSE PROVISIONS (% OF PREMIUM):

Category of Expected Expenses	(21) (SUPPORT!) Fixed Expense Loading	(22) (SUPPORT!) Variable Expense Loading	(23) (SUPPORT!) Total Expense Loading
Commissions	0.0%	0.0%	0.0%
Other Acquisition	0.0%	0.0%	0.0%
General Expense	0.0%	0.0%	0.0%
Premium Taxes	0.0%	0.0%	0.0%
Misc. Licenses & Fees[1]	0.0%	0.0%	0.0%
Profit & Contingency (per 69O-170.003 F.A.C.)	0.0%	0.0%	0.0%
Other Non-Reinsurance Related Expense (Specify[2])	0.0%	0.0%	0.0%
TOTAL EXPENSES	0.0%	0.0%	0.0%
PERMISSIBLE LOSS & LAE			100.0%

[1]Provide a breakdown by type of licenses/fees and no assessments should be included in the provision.
[2]Must provide detail support and explanation

Created by: Florida Office of Insurance Regulation (Version 10/08)

DEVELOPMENT OF RATE LEVEL INDICATIONS:

(24)	0.0%	Final Projected Incurred Loss & LAE Ratio (Incl Cats)
(25)	0.0%	Net Cost of Reinsurance, If applicable (Optional) (SUPPORT!)
(26)	0.0%	Expected Fixed Expense Ratio
(27)	0.0%	Final Proj. Incurred Loss & LAE Ratio (Incl Cats, Fixed Expense, and the Net Cost of Reinsurance)
(28)	**-100.0%**	Company Indication (100% Credible)
(29)	0.0%	Credibility (SUPPORT!)
(30)	0.0%	Expected Annual Net Trend (i.e., Projected Loss Trend Net of Exposure/Premium Trend)
(31)	0.00	Number of Years Since Last Rate Change(SUPPORT!)
(32)	0.0%	Expected Net Trend Since Last Rate Review (Value receives complement of credibility)
(33)	**0.0%**	**Credibility-Weighted Rate Level Indication**
(34)	**0.0%**	**Company Selected Rate Change** (SUPPORT!)

STATE OF FLORIDA -- OFFICE OF INSURANCE REGULATION
STANDARDIZED RATE LEVEL INDICATIONS FORM

RATE LEVEL INDICATIONS

GROUP NAME:	**ABC Ins. Group**
PRODUCT TYPE:	**MEDICAL MALPRACTICE**
PRODUCT SUB-TYPE:	**Enter Sub-Product Line**
STATE:	**Florida Experience Only**

PREMIUMS:

(1) Calendar/Fiscal Year Ending	(2) Written Premiums (Dollars)	(3) Earned Premiums (Dollars)	(4) (SUPPORT!) Earned Premiums at Current Rate Level (Dollars)	(5) Exposure/ Premium Trend Factors	(6) Trended Earned Premiums at Current Rate Level (Dollars)
mm/dd/yyyy	$0	$0	$0	1.000	$0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
TOTAL	$0	$0	$0		$0

(A) Loss Experience Eval. Date:	(SUPPORT!)	mm/dd/yyyy
(B) Annual Premium Trend:	(SUPPORT!)	0.0%
(C) Annual Loss Trend (Up-to-Date):	(SUPPORT!)	0.0%
(D) Annual Loss Trend (Projected):	(SUPPORT!)	0.0%
(E) Avg. Acc. Date for Proj. Rates:	(SUPPORT!)	mm/dd/yyyy

Note:
(1) If coverage is provided on a Claims-Made basis, then use Report Year in Column (1) instead of Accident Year. Change Cell A39 to "Report".

Refer to Overall and Product Instruction tabs for detailed instructions in filling out this indication workbook.

ACTUAL LOSSES:

(1) Enter either accident year or report year below: Report Year Ending	(7) Paid (Dollars)	(8) Outstanding (Dollars)	(9) Incurred (Dollars)	(10) (SUPPORT!) Actual Incurred ULAE (Dollars)	(11) Actual Incurred Loss & LAE (Dollars)
	--- ACTUAL REPORT YEAR INCURRED LOSSES & ALAE				
mm/dd/yyyy	$0	$0	$0	$0	$0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
TOTAL	$0	$0	$0	$0	$0

DEVELOPMENT OF PROJECTED LOSS & LAE RATIO:

(1) Report Year Ending	(12) Actual Incurred Loss & LAE (Dollars)	(13) (SUPPORT!) Loss & ALAE Develop-ment Factors	(14) Loss Trend Factors	(15) Trended & Developed Incurred Loss & LAE (Dollars)	(16) Trended & Developed Incurred Loss & LAE Ratio	(17) (SUPPORT!) Adjustment Factor for Law Changes, etc.	(18) Final Adjusted Expected Incurred Loss & LAE Ratio	(19) (SUPPORT!) (Optional) Accident Year Weights	(20) (Optional) Weighted Trended & Developed Incurred Loss & LAE Ratio
mm/dd/yyyy	$0	1.000	1.000	$0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
TOTAL	$0			$0	0.0%		0.0%	0.0%	0.0%

IF THIS FILING CONTAINS A PROVISION FOR THE NET COST OF REINSURANCE, INCLUDE AN ADDITIONAL WORKSHEET SHOWING HOW YOU HAVE DETERMINED THE NET COST OF REINSURANCE AND HOW YOU HAVE INCORPORATED THAT COST INTO THIS RATE INDICATION

PROSPECTIVE EXPENSE PROVISIONS (% OF PREMIUM):

Category of Expected Expenses	(21) (SUPPORT!) Fixed Expense Loading	(22) (SUPPORT!) Variable Expense Loading	(23) (SUPPORT!) Total Expense Loading
Commissions	0.0%	0.0%	0.0%
Other Acquisition	0.0%	0.0%	0.0%
General Expense	0.0%	0.0%	0.0%
Premium Taxes	0.0%	0.0%	0.0%
Misc. Licenses & Fees[1]	0.0%	0.0%	0.0%
Profit & Contingency (per 69O-170.003 F.A.C.)	0.0%	0.0%	0.0%
Other Non-Reinsurance Related Expense (Specify[2])	0.0%	0.0%	0.0%
TOTAL EXPENSES	0.0%	0.0%	0.0%
PERMISSIBLE LOSS & LAE			100.0%

[1]Provide a breakdown by type of licenses/fees and no assessments should be included in the provision.
[2]Must provide detail support and explanation

Created by: Florida Office of Insurance Regulation (Version 10/08)

DEVELOPMENT OF RATE LEVEL INDICATIONS:

(24) 0.0% Final Projected Incurred Loss & LAE Ratio (Incl Cats)

(25) 0.0% Net Cost of Reinsurance, If applicable (Optional) **(SUPPORT!)**

(26) 0.0% Expected Fixed Expense Ratio

(27) 0.0% Final Proj. Incurred Loss & LAE Ratio
(Incl Cats, Fixed Expense, and the Net Cost of Reinsurance)

(28) **-100.0%** Company Indication (100% Credible)

(29) 0.0% Credibility **(SUPPORT!)**

(30) 0.0% Expected Annual Net Trend
(i.e., Projected Loss Trend Net of Exposure/Premium Trend)

(31) 0.00 Number of Years Since Last Rate Change**(SUPPORT!)**

(32) 0.0% Expected Net Trend Since Last Rate Review
(Value receives complement of credibility)

(33) **0.0%** **Credibility-Weighted Rate Level Indication**

(34) **0.0%** **Company Selected Rate Change** **(SUPPORT!)**

STATE OF FLORIDA -- OFFICE OF INSURANCE REGULATION
STANDARDIZED RATE LEVEL INDICATIONS FORM

RATE LEVEL INDICATIONS

GROUP NAME:	ABC Ins. Group
PRODUCT TYPE:	Enter Other Line Of Business (Personal Umbrella, Misc. Liability, etc.)
PRODUCT SUB-TYPE:	Not Available
STATE:	Florida Experience Only

PREMIUMS:

(1) Calendar/Fiscal Year Ending	(2) Written Premiums (Dollars)	(3) Earned Premiums (Dollars)	(4) (SUPPORT!) Earned Premiums at Current Rate Level (Dollars)	(5) Exposure/ Premium Trend Factors	(6) Trended Earned Premiums at Current Rate Level (Dollars)
mm/dd/yyyy	$0	$0	$0	1.000	$0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
TOTAL	$0	$0	$0		$0

(A) Loss Experience Eval. Date: (SUPPORT!)	mm/dd/yyyy
(B) Annual Premium Trend: (SUPPORT!)	0.0%
(C) Annual Loss Trend (Up-to-Date): (SUPPORT!)	0.0%
(D) Annual Loss Trend (Projected): (SUPPORT!)	0.0%
(E) Avg. Acc. Date for Proj. Rates: (SUPPORT!)	mm/dd/yyyy

Note:

(1) If coverage is provided on a Claims-Made basis, then use Report Year in Column (1) instead of Accident Year. Change Cell A39 to "Report".

Refer to Overall and Product Instruction tabs for detailed instructions in filling out this indication workbook.

ACTUAL LOSSES:

(1) Enter either accident year or report year below: Accident Year Ending	(7) Paid (Dollars)	(8) Outstanding (Dollars)	(9) Incurred (Dollars)	(10) (SUPPORT!) Actual Incurred ULAE (Dollars)	(11) Actual Incurred Loss & LAE (Dollars)
	--- ACTUAL ACCIDENT YEAR INCURRED LOSSES & AL				
mm/dd/yyyy	$0	$0	$0	$0	$0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0
TOTAL	$0	$0	$0	$0	$0

DEVELOPMENT OF PROJECTED LOSS & LAE RATIO:

(1) Accident Year Ending	(12) Actual Incurred Loss & LAE (Dollars)	(13) (SUPPORT!) Loss & ALAE Develop-ment Factors	(14) Loss Trend Factors	(15) Trended & Developed Incurred Loss & LAE (Dollars)	(16) Trended & Developed Incurred Loss & LAE Ratio	(17) (SUPPORT!) Adjustment Factor for Law Changes, etc.	(18) Final Adjusted Expected Incurred Loss & LAE Ratio	(19) (SUPPORT!) (Optional) Accident Year Weights	(20) (Optional) Weighted Trended & Developed Incurred Loss & LAE Ratio
mm/dd/yyyy	$0	1.000	1.000	$0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0.0%	1.000	0.0%	0.0%	
TOTAL	$0			$0	0.0%		0.0%	0.0%	0.0%

IF THIS FILING CONTAINS A PROVISION FOR THE NET COST OF REINSURANCE, INCLUDE AN ADDITIONAL WORKSHEET SHOWING HOW YOU HAVE DETERMINED THE NET COST OF REINSURANCE AND HOW YOU HAVE INCORPORATED THAT COST INTO THIS RATE INDICATION

PROSPECTIVE EXPENSE PROVISIONS (% OF PREMIUM):

Category of Expected Expenses	(21) (SUPPORT!) Fixed Expense Loading	(22) (SUPPORT!) Variable Expense Loading	(23) (SUPPORT!) Total Expense Loading
Commissions	0.0%	0.0%	0.0%
Other Acquisition	0.0%	0.0%	0.0%
General Expense	0.0%	0.0%	0.0%
Premium Taxes	0.0%	0.0%	0.0%
Misc. Licenses & Fees[1]	0.0%	0.0%	0.0%
Profit & Contingency (per 69O-170.003 F.A.C.)	0.0%	0.0%	0.0%
Other Non-Reinsurance Related Expense (Specify[2])	0.0%	0.0%	0.0%
TOTAL EXPENSES	0.0%	0.0%	0.0%
PERMISSIBLE LOSS & LAE			100.0%

[1]Provide a breakdown by type of licenses/fees and no assessments should be included in the provision.
[2]Must provide detail support and explanation

Created by: Florida Office of Insurance Regulation (Version 10/08)

DEVELOPMENT OF RATE LEVEL INDICATIONS:

(24)	0.0%	Final Projected Incurred Loss & LAE Ratio (Incl Cats)
(25)	0.0%	Net Cost of Reinsurance, If applicable (Optional) (SUPPORT!)
(26)	0.0%	Expected Fixed Expense Ratio
(27)	0.0%	Final Proj. Incurred Loss & LAE Ratio (Incl Cats, Fixed Expense, and the Net Cost of Reinsurance)
(28)	**-100.0%**	Company Indication (100% Credible)
(29)	0.0%	Credibility (SUPPORT!)
(30)	0.0%	Expected Annual Net Trend (i.e., Projected Loss Trend Net of Exposure/Premium Trend)
(31)	0.00	Number of Years Since Last Rate Change(SUPPORT!)
(32)	0.0%	Expected Net Trend Since Last Rate Review (Value receives complement of credibility)
(33)	**0.0%**	**Credibility-Weighted Rate Level Indication**
(34)	**0.0%**	**Company Selected Rate Change** (SUPPORT!)

F O R M U L A S   A P P E A R I N G   I N   R A T E   L E V E L   I N D I C A T I O N S   F O R M

FOR COMMERCIAL PROPERTY, COMMERCIAL INDIVISIBLE PKG (BOP), AND OTHER LINES (5 YEARS)

(Informational Purposes Only)

(5) =[1.00 + (B)] ^ {[(E) - (1)] / 365.25 + 0.50}

(6) =(4) x (5)

(10) =(7) -(8) -(9)

(14) =(11) -(12) -(13)

(16) =(10) + (14) +(15)

(23) =(17) + (18) +(19) + (20) + (21) + (22)

(24) =(16)

(26) =[1.00 + (C)] ^ {[{Last entry in (1)} - (1)] / 365.25} x [1.00 + (D)] ^ {[(H) - {Last entry in (1)}] / 365.25+ 0.50}

(27) =(24) x (25) x (26)

(28) =(23)

(29) =(27) + (28)

(31) =(29) x (30)

(32) =(31) ÷ (6)

(33) =(Optional) Company selected weights. Actuarial support required. The weights must add to 100%.
Note: Once this option is selected, company must apply these same weights to all subsequent indications.

(34) =(Optional) Sumproduct of (32) and (33)

(35) =Fixed Expenses (support must be provided with at least 3 years of data)

(36) =Variable Expenses (support must be provided with at least 3 years of data)

(37) =(35) + (36) Expenses must be equal to those reported in the OIR-B1-595 or OIR-B1-583 forms.

(38) =The total derived from either (32) or (34)

(39) =Net Cost of Reinsurance. Support must be provided per instruction if applying.

(40) =Total of (35)

(41) =(38) + (39) + (40)

(42) =(41) ÷ [1.00 - Total of (36)] - 1

(43) =Credibility. Actuarial support of the credibility methodology used and derivation of the full credibility standard must be provided.

(44) =[1.00 + (D)] / [1.00 + (B)] - 1.00

(45) =The number of year(s) since the last company indicated rate change approved.

(46) =[1.00 + (44)] ^ (45) - 1.00 *(^ denotes exponentiation)*

(47) =[(42) x (43)] + [(46) x [1.00 - (43)]

(48) =Company selection must be supported if rate change selected is different from indicated (47)

STATE OF FLORIDA -- OFFICE OF INSURANCE REGULATION
STANDARDIZED RATE LEVEL INDICATIONS FORM

RATE LEVEL INDICATIONS

GROUP NAME:	ABC Ins. Group
PRODUCT TYPE:	COMMERCIAL INDIVISIBLE PKG (BOP)
PRODUCT SUB-TYPE:	Enter Sub-Product Line
STATE:	Florida Experience Only

PREMIUMS:

(1) Calendar/Fiscal Year Ending	(2) Written Premiums (Dollars)	(3) Earned Premiums (Dollars)	(4) (SUPPORT!) Earned Premiums at Current Rate Level (Dollars)	(5) Exposure/ Premium Trend Factors	(6) Trended Earned Premiums at Current Rate Level (Dollars)
mm/dd/yyyy	$0	$0	$0	1.000	$0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
TOTAL	$0	$0	$0		$0

(A) Loss Experience Eval. Date: (SUPPORT!)	mm/dd/yyyy
(B) Annual Premium Trend: (SUPPORT!)	0.0%
(C) Annual Loss Trend (Up-to-Date): (SUPPORT!)	0.0%
(D) Annual Loss Trend (Projected): (SUPPORT!)	0.0%
(E) Avg. Acc. Date for Proj. Rates: (SUPPORT!)	mm/dd/yyyy

Note:
Refer to Overall and Product Instruction tabs for detailed instructions in filling out this indication workbook.

Separate rate indications are required for commercial non-residential and residential risks as stated in the instruction sheet. Do not pool the data for the indication.

ACTUAL LOSSES:

(1)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	------------ ACTUAL INCURRED LOSSES ------------				------------ ACTUAL INCURRED ALAE ------------				(SUPPORT!)	
Accident Year Ending	Incl. Cats. (Dollars)	Non-Hurr. Cat. (Dollars)	Hurricane Cat. (Dollars)	Excl. Cats. (Dollars)	Incl. Cats. (Dollars)	Non-Hurr. Cat. (Dollars)	Hurricane Cat. (Dollars)	Excl. Cats. (Dollars)	Incurred ULAE Excl. Cats. (Dollars)	Actual Incurred Loss & LAE Excl. Cats. (Dollars)
mm/dd/yyyy	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
mm/dd/yyyy	0	0	0	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0	0	0	0
TOTAL	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

EXPECTED CATASTROPHE LOSSES:

(1)	(17)	(18)	(19)	(20)	(21)	(22)	(23)
	--- EXPECTED NON-HURR. CAT. LOSSES ---			--- EXPECTED HURR. CAT. LOSSES ---			
Accident Year Ending	(SUPPORT!) Losses (Dollars)	(SUPPORT!) ALAE (Dollars)	(SUPPORT!) ULAE (Dollars)	(SUPPORT!) Losses (Dollars)	(SUPPORT!) ALAE (Dollars)	(SUPPORT!) ULAE (Dollars)	Expected Incurred Cat. Loss & LAE (Dollars)
mm/dd/yyyy	$0	$0	$0	$0	$0	$0	$0
mm/dd/yyyy	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0
TOTAL	$0	$0	$0	$0	$0	$0	$0

DEVELOPMENT OF PROJECTED LOSS & LAE RATIO:

(1) Accident Year Ending	(24) Actual Incurred Loss & LAE (Excl. Cats.) (Dollars)	(25) (SUPPORT!) Loss & ALAE Develop-ment Factors	(26) Loss Trend Factors	(27) Trended & Developed Incurred Loss & LAE (Excl. Cats.) (Dollars)	(28) Expected Incurred Cat. Loss & LAE (Dollars)	(29) Trended & Developed Incurred Loss & LAE (Incl. Cats.) (Dollars)	(30) (SUPPORT!) Adjustment Factor for Law Changes, etc.	(31) Final Adjusted Expected Incurred Loss & LAE (Dollars)	(32) Final Adjusted Incurred Loss & LAE Ratio	(33) (SUPPORT!) (Optional) Accident Year Weights	(34) (Optional) Weighted Trended & Developed Incurred Loss & LAE Ratio
mm/dd/yyyy	$0	1.000	1.000	$0	$0	$0	1.000	$0	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0	0	1.000	0	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0	0	1.000	0	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0	0	1.000	0	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0	0	1.000	0	0.0%	0.0%	
TOTAL	$0			$0	$0	$0		$0	0.0%	0.0%	0.0%

IF THIS FILING CONTAINS A PROVISION FOR THE NET COST OF REINSURANCE, INCLUDE AN ADDITIONAL WORKSHEET SHOWING HOW YOU HAVE DETERMINED THE NET COST OF REINSURANCE AND HOW YOU HAVE INCORPORATED THAT COST INTO THIS RATE INDICATION

PROSPECTIVE EXPENSE PROVISIONS (% OF PREMIUM):

Category of Expected Expenses	(35) (SUPPORT!) Fixed Expense Loading	(36) (SUPPORT!) Variable Expense Loading	(37) (SUPPORT!) Total Expense Loading
Commissions	0.0%	0.0%	0.0%
Other Acquisition	0.0%	0.0%	0.0%
General Expense	0.0%	0.0%	0.0%
Premium Taxes	0.0%	0.0%	0.0%
Misc. Licenses & Fees[1]	0.0%	0.0%	0.0%
Profit & Contingency (per 69O-170.003 F.A.C.)	0.0%	0.0%	0.0%
Other Non-Reinsurance Related Expense (Specify[2])	0.0%	0.0%	0.0%
TOTAL EXPENSES	0.0%	0.0%	0.0%
PERMISSIBLE LOSS & LAE			100.0%

[1]Provide a breakdown by type of licenses/fees and no assessments should be included in the provision.
[2]Must provide detail support and explanation
[3]Provide support if number of years since last rate change is greater than 1.00 since this line of business is subjected to annual rate certif

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DEVELOPMENT OF RATE LEVEL INDICATIONS:

(38)	0.0%	Final Projected Incurred Loss & LAE Ratio (Incl Cats)
(39)	0.0%	Net Cost of Reinsurance, If applicable (Optional) (SUPPORT!)
(40)	0.0%	Expected Fixed Expense Ratio
(41)	0.0%	Final Proj. Incurred Loss & LAE Ratio (Incl Cats, Fixed Expense, and the Net Cost of Reinsurance)
(42)	-100.0%	Company Indication (100% Credible)
(43)	0.0%	Credibility (SUPPORT!)
(44)	0.0%	Expected Annual Net Trend (i.e., Projected Loss Trend Net of Exposure/Premium Trend)
(45)	0.00	Number of Years Since Last Rate Change[3](SUPPORT!)
(46)	0.0%	Expected Net Trend Since Last Rate Review (Value receives complement of credibility)
(47)	**0.0%**	**Credibility-Weighted Rate Level Indication**
(48)	**0.0%**	**Company Selected Rate Change** (SUPPORT!)

STATE OF FLORIDA -- OFFICE OF INSURANCE REGULATION
STANDARDIZED RATE LEVEL INDICATIONS FORM

R A T E   L E V E L   I N D I C A T I O N S

GROUP NAME:	Citizens Property Insurance Corporation
PRODUCT TYPE:	COMMERCIAL PROPERTY
PRODUCT SUB-TYPE:	Non-Residential Only
STATE:	Florida Experience Only

PREMIUMS:

(1) Calendar/Fiscal Year Ending	(2) Written Premiums (Dollars)	(3) Earned Premiums (Dollars)	(4) (SUPPORT!) Earned Premiums at Current Rate Level (Dollars)	(5) Exposure/ Premium Trend Factors	(6) Trended Earned Premiums at Current Rate Level (Dollars)
12/31/2004	$31,080,840	$30,316,786	$34,864,304	1.749	$60,969,193
12/31/2005	33,371,016	31,748,446	36,510,713	1.605	58,592,252
12/31/2006	50,629,872	42,510,820	48,887,443	1.473	71,995,876
12/31/2007	56,738,327	54,178,340	62,305,091	1.351	84,202,359
12/31/2008	62,194,102	59,293,557	64,158,363	1.240	79,550,371
TOTAL	$234,014,157	$218,047,949	$246,725,914		$355,310,051

(A) Loss Experience Eval. Date: (SUPPORT!)	3/31/2009
(B) Annual Premium Trend: (SUPPORT!)	9.0%
(C) Annual Loss Trend (Up-to-Date): (SUPPORT!)	15.9%
(D) Annual Loss Trend (Projected): (SUPPORT!)	15.9%
(E) Avg. Acc. Date for Proj. Rates: (SUPPORT!)	1/1/2011

Note:
Refer to Overall and Product Instruction tabs for detailed instructions in filling out this indication workbook.

Separate rate indications are required for commercial non-residential and residential risks as stated in the instruction sheet. Do not pool the data for the indication.

ACTUAL LOSSES:

(1) Accident Year Ending	(7) ACTUAL INCURRED LOSSES: Incl. Cats. (Dollars)	(8) Non-Hurr. Cat. (Dollars)	(9) Hurricane Cat. (Dollars)	(10) Excl. Cats. (Dollars)	(11) ACTUAL INCURRED ALAE: Incl. Cats. (Dollars)	(12) Non-Hurr. Cat. (Dollars)	(13) Hurricane Cat. (Dollars)	(14) Excl. Cats. (Dollars)	(15) (SUPPORT!) Incurred ULAE Excl. Cats. (Dollars)	(16) Actual Incurred Loss & LAE Excl. Cats. (Dollars)
12/31/2004	$231,335,075	$0	$231,187,416	$147,659	$8,679,566	$0	$8,648,528	$31,038	$1,786	$180,483
12/31/2005	270,511,002	0	269,428,220	1,082,782	11,465,484	0	11,393,440	72,044	31,328	1,186,154
12/31/2006	476,144	32,870	0	443,274	30,155	175	0	29,980	36,552	509,806
12/31/2007	820,396	0	0	820,396	60,005	0	0	60,005	49,911	930,312
12/31/2008	1,683,184	1,453,502	0	229,682	57,582	44,438	0	13,144	21,224	264,050
TOTAL	$504,825,801	$1,486,372	$500,615,636	$2,723,793	$20,292,792	$44,613	$20,041,968	$206,211	$140,801	$3,070,805

EXPECTED CATASTROPHE LOSSES:

(1) Accident Year Ending	(17) EXPECTED NON-HURR. CAT. LOSSES: (SUPPORT!) Losses (Dollars)	(18) (SUPPORT!) ALAE (Dollars)	(19) (SUPPORT!) ULAE (Dollars)	(20) EXPECTED HURR. CAT. LOSSES: (SUPPORT!) Losses (Dollars)	(21) (SUPPORT!) ALAE (Dollars)	(22) (SUPPORT!) ULAE (Dollars)	(23) Expected Incurred Cat. Loss & LAE (Dollars)
12/31/2004	$535,929	$21,543	$34,026	$86,569,115	$3,465,764	$5,494,469	$96,120,846
12/31/2005	$515,035	$20,703	$32,700	83,194,136	3,330,647	5,280,261	92,373,483
12/31/2006	$632,855	$25,439	$40,180	102,225,713	4,092,570	6,488,180	113,504,937
12/31/2007	$740,152	$29,752	$46,992	119,557,490	4,786,441	7,588,213	132,749,041
12/31/2008	$699,261	$28,109	$44,396	112,952,210	4,522,001	7,168,981	125,414,958
TOTAL	$3,123,233	$125,547	$198,295	$504,498,664	$20,197,424	$32,020,104	$560,163,265

DEVELOPMENT OF PROJECTED LOSS & LAE RATIO:

(1) Accident Year Ending	(24) Actual Incurred Loss & LAE (Excl. Cats.) (Dollars)	(25) (SUPPORT!) Loss & ALAE Develop-ment Factors	(26) Loss Trend Factors	(27) Trended & Developed Incurred Loss & LAE (Excl. Cats.) (Dollars)	(28) Expected Incurred Cat. Loss & LAE (Dollars)	(29) Trended & Developed Incurred Loss & LAE (Incl. Cats.) (Dollars)	(30) (SUPPORT!) Adjustment Factor for Law Changes, etc.	(31) Final Adjusted Expected Incurred Loss & LAE (Dollars)	(32) Final Adjusted Incurred Loss & LAE Ratio	(33) (SUPPORT!) (Optional) Accident Year Weights	(34) (Optional) Weighted Trended & Developed Incurred Loss & LAE Ratio
12/31/2004	$180,483	1.00436	2.616	$474,233	$96,120,846	$96,595,079	1.000	$96,595,079	158.4%	20.0%	
12/31/2005	1,186,154	1.01065	2.257	2,705,267	92,373,483	95,078,750	1.000	95,078,750	162.3%	20.0%	
12/31/2006	509,806	1.02044	1.947	1,012,652	113,504,937	114,517,589	1.000	114,517,589	159.1%	20.0%	
12/31/2007	930,312	1.03761	1.679	1,620,811	132,749,041	134,369,852	1.000	134,369,852	159.6%	20.0%	
12/31/2008	264,050	1.13584	1.448	434,207	125,414,958	125,849,165	1.000	125,849,165	158.2%	20.0%	
TOTAL	$3,070,805			$6,247,170	$560,163,265	$566,410,436		$566,410,436	159.4%	100.0%	159.5%

IF THIS FILING CONTAINS A PROVISION FOR THE NET COST OF REINSURANCE, INCLUDE AN ADDITIONAL WORKSHEET SHOWING HOW YOU HAVE DETERMINED THE NET COST OF REINSURANCE AND HOW YOU HAVE INCORPORATED THAT COST INTO THIS RATE INDICATION

PROSPECTIVE EXPENSE PROVISIONS (% OF PREMIUM):

Category of Expected Expenses	(35) (SUPPORT!) Fixed Expense Loading	(36) (SUPPORT!) Variable Expense Loading	(37) (SUPPORT!) Total Expense Loading
Commissions	0.0%	14.0%	14.0%
Other Acquisition	0.4%	0.0%	0.4%
General Expense	5.3%	0.0%	5.3%
Premium Taxes	0.0%	1.75%	1.8%
Misc. Licenses & Fees[1]	0.0%	0.36%	0.4%
Profit & Contingency (per 69O-170.003 F.A.C.)	0.0%	0.0%	0.0%
Other Non-Reinsurance Related Expense (Specify[2])	0.0%	10.0%	10.0%
TOTAL EXPENSES	5.7%	26.1%	31.8%
PERMISSIBLE LOSS & LAE			68.2%

[1]Provide a breakdown by type of licenses/fees and no assessments should be included in the provision.
[2]Must provide detail support and explanation

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DEVELOPMENT OF RATE LEVEL INDICATIONS:

(38)	159.5%	Final Projected Incurred Loss & LAE Ratio (Incl Cats)
(39)	0.0%	Net Cost of Reinsurance, If applicable (Optional) (SUPPORT!)
(40)	5.7%	Expected Fixed Expense Ratio
(41)	165.2%	Final Proj. Incurred Loss & LAE Ratio (Incl Cats, Fixed Expense, and the Net Cost of Reinsurance)
(42)	**123.6%**	Company Indication (100% Credible)
(43)	100.0%	Credibility (SUPPORT!)
(44)	6.4%	Expected Annual Net Trend (i.e., Projected Loss Trend Net of Exposure/Premium Trend)
(45)	1.92	Number of Years Since Last Rate Change(SUPPORT!)
(46)	12.6%	Expected Net Trend Since Last Rate Review (Value receives complement of credibility)
(47)	**123.6%**	**Credibility-Weighted Rate Level Indication**
(48)	**9.9%**	**Company Selected Rate Change** (SUPPORT!)

STATE OF FLORIDA -- OFFICE OF INSURANCE REGULATION
STANDARDIZED RATE LEVEL INDICATIONS FORM

RATE LEVEL INDICATIONS

GROUP NAME:	**ABC Ins. Group**
PRODUCT TYPE:	**Enter Line Of Business (Personal Inland Marine, Service Contracts, etc.)**
PRODUCT SUB-TYPE:	**Not Available**
STATE:	**Florida Experience Only**

PREMIUMS:

(1) Calendar/Fiscal Year Ending	(2) Written Premiums (Dollars)	(3) Earned Premiums (Dollars)	(4) (SUPPORT!) Earned Premiums at Current Rate Level (Dollars)	(5) Exposure/ Premium Trend Factors	(6) Trended Earned Premiums at Current Rate Level (Dollars)
mm/dd/yyyy	$0	$0	$0	1.000	$0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
mm/dd/yyyy	0	0	0	1.000	0
TOTAL	$0	$0	$0		$0

(A) Loss Experience Eval. Date: **(SUPPORT!)**	mm/dd/yyyy
(B) Annual Premium Trend: **(SUPPORT!)**	0.0%
(C) Annual Loss Trend (Up-to-Date): **(SUPPORT!)**	0.0%
(D) Annual Loss Trend (Projected): **(SUPPORT!)**	0.0%
(E) Avg. Acc. Date for Proj. Rates: **(SUPPORT!)**	mm/dd/yyyy

Note:
Refer to Overall and Product Instruction tabs for detailed instructions in filling out this indication workbook.

ACTUAL LOSSES:

(1) Accident Year Ending	(7) ------------- ACTUAL INCURRED LOSSES ------------- Incl. Cats. (Dollars)	(8) If applicable Non-Hurr Cat. (Dollars)	(9) If applicable Hurricane Cat. (Dollars)	(10) Excl. Cats. (Dollars)	(11) ------------- ACTUAL INCURRED ALAE ------------- Incl. Cats. (Dollars)	(12) If applicable Non-Hurr Cat. (Dollars)	(13) If applicable Hurricane Cat. (Dollars)	(14) Excl. Cats. (Dollars)	(15) (SUPPORT!) Incurred ULAE Excl. Cats. (Dollars)	(16) Actual Incurred Loss & LAE Excl. Cats. (Dollars)
mm/dd/yyyy	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
mm/dd/yyyy	0	0	0	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0	0	0	0
TOTAL	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

EXPECTED CATASTROPHE LOSSES:

(1) Accident Year Ending	(17) --- EXPECTED NON-HURR. CAT. LOSSES --- (If appliacable) (SUPPORT!) Losses (Dollars)	(18) (SUPPORT!) ALAE (Dollars)	(19) (SUPPORT!) ULAE (Dollars)	(20) --- EXPECTED HURR. CAT. LOSSES --- (If appliacable) (SUPPORT!) Losses (Dollars)	(21) (SUPPORT!) ALAE (Dollars)	(22) (SUPPORT!) ULAE (Dollars)	(23) Expected Incurred Cat. Loss & LAE (If applicable) (Dollars)
mm/dd/yyyy	$0	$0	$0	$0	$0	$0	$0
mm/dd/yyyy	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0
mm/dd/yyyy	0	0	0	0	0	0	0
TOTAL	$0	$0	$0	$0	$0	$0	$0

DEVELOPMENT OF PROJECTED LOSS & LAE RATIO:

(1) Accident Year Ending	(24) Actual Incurred Loss & LAE (Excl. Cats.) (Dollars)	(25) (SUPPORT!) Loss & ALAE Develop-ment Factors	(26) Loss Trend Factors	(27) Trended & Developed Incurred Loss & LAE (Excl. Cats.) (Dollars)	(28) Expected Incurred Cat. Loss & LAE (Dollars)	(29) Trended & Developed Incurred Loss & LAE (Incl. Cats.) (Dollars)	(30) (SUPPORT!) Adjustment Factor for Law Changes, etc.	(31) Final Adjusted Expected Incurred Loss & LAE (Dollars)	(32) Final Adjusted Incurred Loss & LAE Ratio	(33) (SUPPORT!) (Optional) Accident Year Weights	(34) (Optional) Weighted Trended & Developed Incurred Loss & LAE Ratio
mm/dd/yyyy	$0	1.000	1.000	$0	$0	$0	1.000	$0	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0	0	1.000	0	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0	0	1.000	0	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0	0	1.000	0	0.0%	0.0%	
mm/dd/yyyy	0	1.000	1.000	0	0	0	1.000	0	0.0%	0.0%	
TOTAL	$0			$0	$0	$0		$0	0.0%	0.0%	0.0%

IF THIS FILING CONTAINS A PROVISION FOR THE NET COST OF REINSURANCE, INCLUDE AN ADDITIONAL WORKSHEET SHOWING HOW YOU HAVE DETERMINED THE NET COST OF REINSURANCE AND HOW YOU HAVE INCORPORATED THAT COST INTO THIS RATE INDICATION

PROSPECTIVE EXPENSE PROVISIONS (% OF PREMIUM):

Category of Expected Expenses	(35) (SUPPORT!) Fixed Expense Loading	(36) (SUPPORT!) Variable Expense Loading	(37) (SUPPORT!) Total Expense Loading
Commissions	0.0%	0.0%	0.0%
Other Acquisition	0.0%	0.0%	0.0%
General Expense	0.0%	0.0%	0.0%
Premium Taxes	0.0%	0.0%	0.0%
Misc. Licenses & Fees[1]	0.0%	0.0%	0.0%
Profit & Contingency (per 69O-170.003 F.A.C.)	0.0%	0.0%	0.0%
Other Non-Reinsurance Related Expense (Specify[2])	0.0%	0.0%	0.0%
TOTAL EXPENSES	0.0%	0.0%	0.0%
PERMISSIBLE LOSS & LAE			100.0%

[1]Provide a breakdown by type of licenses/fees and no assessments should be included in the provision.
[2]Must provide detail support and explanation

DEVELOPMENT OF RATE LEVEL INDICATIONS:

(38)	0.0%	Final Projected Incurred Loss & LAE Ratio (Incl Cats)
(39)	0.0%	Net Cost of Reinsurance, If applicable (Optional) **(SUPPORT!)**
(40)	0.0%	Expected Fixed Expense Ratio
(41)	0.0%	Final Proj. Incurred Loss & LAE Ratio (Incl Cats, Fixed Expense, and the Net Cost of Reinsurance)
(42)	**-100.0%**	Company Indication (100% Credible)
(43)	0.0%	Credibility **(SUPPORT!)**
(44)	0.0%	Expected Annual Net Trend (i.e., Projected Loss Trend Net of Exposure/Premium Trend)
(45)	0.00	Number of Years Since Last Rate Change**(SUPPORT!)**
(46)	0.0%	Expected Net Trend Since Last Rate Review (Value receives complement of credibility)
(47)	**0.0%**	**Credibility-Weighted Rate Level Indication**
(48)	**0.0%**	**Company Selected Rate Change** **(SUPPORT!)**

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E R R O R C H E C K I N

NUMBER OF TESTS PASSED (BLANK'S)
NUMBER OF TESTS FAILED (FALSE'S):
NUMBER OF TESTS TOTAL:

G SHEET

1 0 1

CITIZENS PROPERTY INSURANCE CORPORATION
101 NORTH MONROE STREET, SUITE 1000
TALLAHASSEE, FLORIDA 32301

TELEPHONE: (850) 513-3700 FAX: (850) 513-3900

October 06, 2009

Kevin McCarty, Commissioner
Office of Insurance Regulation
200 East Gaines Street
Tallahassee, Florida 32399-0330

Attention: Richard Koon, Director of Property and Casualty Product Review

Re: Citizens' Commercial Non-Residential Wind-Only Rate Filing

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Dear Mr. McCarty:

This letter serves to comply with the Source of Information for the standardized rate indication workbooks. For the source of information for the document titled "RIF (CNRW) 10_06.xls", please refer to the following workbooks:

CNRW-Statewide Rate Indication.xls
CNRW-Territory Indication.xls

The table of contents in each workbook lists all of the exhibits along with a brief description. The exhibits are named after the column or row of the rate indication workbook, which they correspond to.

If you or your staff has any questions, please contact me at (904) 208-7593.

Sincerely,

Brian Donovan, FCAS, MAAA
Director, Actuarial Services

G. Bruce Douglas - Chairman, St. Johns County ● Gloria Fletcher - Vice-Chair, Alachua County
John Collins, Broward County ● Cheryl Herrin, Hillsborough County ● Earl Horton, Pinellas County ● Jay Odom, Okaloosa County
Carlos Lacasa, Miami-Dade County ● Richard DeChene, Leon County ● Scott Wallace, President

Exhibit	Description
RIF Duplicate	Duplicate of OIR RIF for all policies combined, with a provision for the FHCF rapid cash buildup
4A	On-level factors approximated on a state-wide basis using the parallelogram method
4B	Shows earned premiums at current rates
7-9	Historical losses evaluated as of 3/31/2009
11-13	Historical ALAE evaluated as of 3/31/2009
15A	Shows historical ratios of LAE to losses from Schedule P, part 1
15B	Estimates ratio of ULAE to losses
17-19A	Estimates the Ratio of Projected Non-Hurricane Catastrophe Losses to Hurricane Losses
17-19B	Estimate of ALAE, ULAE to Loss Ratios for Non-Hurricane Catastrophes
17-19C	Estimate of Non-Hurricane Catastrophes ALAE, ULAE and Loss Ratios
20-22A	Estimates ratio of hurricane LAE to hurricane losses from historical ratios
20-22B	Projected RMS Model hurricane loss ratio
20-22C	Shows RMS Model projected hurricane loss and LAE
25	Historical ALAE adjutsed for sinkhole presumed factor
35-36	Selection of "Other Acquisition Expense", "General Expense" and "Taxes, Licenses and Fees" expense ratios from historical experience in Insurance Expense Exhibit
Appendix A, Page 1	Shows on-leveling of 12/31/2008 inforce premium for frame construction
Appendix A, Page 2	Shows on-leveling of 12/31/2008 inforce premium for masonry construction
Appendix A, Page 3	Shows on-leveling of 12/31/2008 inforce premium for semi-wind resistive construction
Appendix A, Page 4	Shows on-leveling of 12/31/2008 inforce premium for wind resistive construction
Appendix A, Page 5	Shows on-leveling of 12/31/2008 inforce premium for all construction types combined

STATE OF FLORIDA -- OFFICE OF INSURANCE REGULATION
STANDARDIZED RATE LEVEL INDICATIONS FORM

RATE LEVEL INDICATIONS

GROUP NAME:	Citizens Property Insurance Corporation
PRODUCT TYPE:	COMMERCIAL PROPERTY
PRODUCT SUB-TYPE:	Commercial Non Residential Wind Only
STATE:	Florida Experience Only

PREMIUMS:

(1) Calendar/Fiscal Year Ending	(2) Written Premiums (Dollars)	(3) Earned Premiums (Dollars)	(4) (SUPPORT!) Earned Premiums at Current Rate Level (Dollars)	(5) Exposure/ Premium Trend Factors	(6) Trended Earned Premiums at Current Rate Level (Dollars)
12/31/2004	$31,080,840	$30,316,786	$34,864,304	1.749	$60,969,193
12/31/2005	33,371,016	31,748,446	36,510,713	1.605	58,592,252
12/31/2006	50,629,872	42,510,820	48,887,443	1.473	71,995,876
12/31/2007	56,738,327	54,178,340	62,305,091	1.351	84,202,359
12/31/2008	62,194,102	59,293,557	64,158,363	1.240	79,550,371
TOTAL	$234,014,157	$218,047,949	$246,725,914		$355,310,051

(A) Loss Experience Eval. Date: (SUPPORT!)	3/31/2009
(B) Annual Premium Trend: (SUPPORT!)	9.0%
(C) Annual Loss Trend (Up-to-Date): (SUPPORT!)	15.9%
(D) Annual Loss Trend (Projected): (SUPPORT!)	15.9%
(E) Avg. Acc. Date for Proj. Rates: (SUPPORT!)	1/1/2011

Note:
Refer to Overall and Product Instruction tabs for detailed instructions in filling out this indication workbook.

Separate rate indications are required for commercial non-residential and residential risks as stated in the instruction sheet. Do not pool the data for the indication.

ACTUAL LOSSES:

(1) Accident Year Ending	(7) ACTUAL INCURRED LOSSES: Incl. Cats. (Dollars)	(8) ACTUAL INCURRED LOSSES: Non-Hurr. Cat. (Dollars)	(9) ACTUAL INCURRED LOSSES: Hurricane Cat. (Dollars)	(10) ACTUAL INCURRED LOSSES: Excl. Cats. (Dollars)	(11) ACTUAL INCURRED ALAE: Incl. Cats. (Dollars)	(12) ACTUAL INCURRED ALAE: Non-Hurr. Cat. (Dollars)	(13) ACTUAL INCURRED ALAE: Hurricane Cat. (Dollars)	(14) ACTUAL INCURRED ALAE: Excl. Cats. (Dollars)	(15) (SUPPORT!) Incurred ULAE Excl. Cats. (Dollars)	(16) Actual Incurred Loss & LAE Excl. Cats. (Dollars)
12/31/2004	$231,335,075	$0	$231,187,416	$147,659	$8,679,566	$0	$8,648,528	$31,038	$1,786	$180,483
12/31/2005	270,511,002	0	269,428,220	1,082,782	11,465,484	0	11,393,440	72,044	31,328	1,186,154
12/31/2006	476,144	32,870	0	443,274	30,155	175	0	29,980	36,552	509,806
12/31/2007	820,396	0	0	820,396	60,005	0	0	60,005	49,911	930,312
12/31/2008	1,683,184	1,453,502	0	229,682	57,582	44,438	0	13,144	21,224	264,050
TOTAL	$504,825,801	$1,486,372	$500,615,636	$2,723,793	$20,292,792	$44,613	$20,041,968	$206,211	$140,801	$3,070,805

EXPECTED CATASTROPHE LOSSES:

(1) Accident Year Ending	(17) EXPECTED NON-HURR. CAT. LOSSES: (SUPPORT!) Losses (Dollars)	(18) EXPECTED NON-HURR. CAT. LOSSES: (SUPPORT!) ALAE (Dollars)	(19) EXPECTED NON-HURR. CAT. LOSSES: (SUPPORT!) ULAE (Dollars)	(20) EXPECTED HURR. CAT. LOSSES: (SUPPORT!) Losses (Dollars)	(21) EXPECTED HURR. CAT. LOSSES: (SUPPORT!) ALAE (Dollars)	(22) EXPECTED HURR. CAT. LOSSES: (SUPPORT!) ULAE (Dollars)	(23) Expected Incurred Cat. Loss & LAE (Dollars)
12/31/2004	$535,929	$21,543	$34,026	$86,569,115	$3,465,764	$5,494,469	$96,120,846
12/31/2005	$515,035	$20,703	$32,700	83,194,136	3,330,647	5,280,261	92,373,483
12/31/2006	$632,855	$25,439	$40,180	102,225,713	4,092,570	6,488,180	113,504,937
12/31/2007	$740,152	$29,752	$46,992	119,557,490	4,786,441	7,588,213	132,749,041
12/31/2008	$699,261	$28,109	$44,396	112,952,210	4,522,001	7,168,981	125,414,958
TOTAL	$3,123,233	$125,547	$198,295	$504,498,664	$20,197,424	$32,020,104	$560,163,265

DEVELOPMENT OF PROJECTED LOSS & LAE RATIO:

(1) Accident Year Ending	(24) Actual Incurred Loss & LAE (Excl. Cats.) (Dollars)	(25) (SUPPORT!) Loss & ALAE Develop-ment Factors	(26) Loss Trend Factors	(27) Trended & Developed Incurred Loss & LAE (Excl. Cats.) (Dollars)	(28) Expected Incurred Cat. Loss & LAE (Dollars)	(29) Trended & Developed Incurred Loss & LAE (Incl. Cats.) (Dollars)	(30) (SUPPORT!) Adjustment Factor for Law Changes, etc.	(31) Final Adjusted Expected Incurred Loss & LAE (Dollars)	(32) Final Adjusted Incurred Loss & LAE Ratio	(33) (SUPPORT!) (Optional) Accident Year Weights	(34) (Optional) Weighted Trended & Developed Incurred Loss & LAE Ratio
12/31/2004	$180,483	1.00436	2.616	$474,233	$96,120,846	$96,595,079	1.000	$96,595,079	158.4%	20.0%	
12/31/2005	1,186,154	1.01065	2.257	2,705,267	92,373,483	95,078,750	1.000	95,078,750	162.3%	20.0%	
12/31/2006	509,806	1.02044	1.947	1,012,652	113,504,937	114,517,589	1.000	114,517,589	159.1%	20.0%	
12/31/2007	930,312	1.03761	1.679	1,620,811	132,749,041	134,369,852	1.000	134,369,852	159.6%	20.0%	
12/31/2008	264,050	1.13584	1.448	434,207	125,414,958	125,849,165	1.000	125,849,165	158.2%	20.0%	
TOTAL	$3,070,805			$6,247,170	$560,163,265	$566,410,436		$566,410,436	159.4%	100.0%	159.5%

IF THIS FILING CONTAINS A PROVISION FOR THE NET COST OF REINSURANCE, INCLUDE AN ADDITIONAL WORKSHEET SHOWING HOW YOU HAVE DETERMINED THE NET COST OF REINSURANCE AND HOW YOU HAVE INCORPORATED THAT COST INTO THIS RATE INDICATION

PROSPECTIVE EXPENSE PROVISIONS (% OF PREMIUM):

Category of Expected Expenses	(35) (SUPPORT!) Fixed Expense Loading	(36) (SUPPORT!) Variable Expense Loading	(37) (SUPPORT!) Total Expense Loading
Commissions	0.0%	14.0%	14.0%
Other Acquisition	0.4%	0.0%	0.4%
General Expense	5.3%	0.0%	5.3%
Premium Taxes	0.0%	1.8%	1.8%
Misc. Licenses & Fees[1]	0.0%	0.4%	0.4%
Profit & Contingency (per 69O-170.003 F.A.C.)	0.0%	0.0%	0.0%
Other Non-Reinsurance Related Expense (Specify[2])	0.0%	10.0%	10.0%
TOTAL EXPENSES	5.7%	26.1%	31.8%
PERMISSIBLE LOSS & LAE			68.2%

[1]Provide a breakdown by type of licenses/fees and no assessments should be included in the provision.
[2]Must provide detail support and explanation

DEVELOPMENT OF RATE LEVEL INDICATIONS:

(38)	159.5%	Final Projected Incurred Loss & LAE Ratio (Incl Cats)
(39)	0.0%	Net Cost of Reinsurance, If applicable (Optional) (SUPPORT!)
(40)	5.7%	Expected Fixed Expense Ratio
(41)	165.2%	Final Proj. Incurred Loss & LAE Ratio (Incl Cats, Fixed Expense, and the Net Cost of Reinsurance)
(42)	**123.6%**	Company Indication (100% Credible)
(43)	100.0%	Credibility (SUPPORT!)
(44)	6.4%	Expected Annual Net Trend (i.e., Projected Loss Trend Net of Exposure/Premium Trend)
(45)	1.92	Number of Years Since Last Rate Change(SUPPORT!)
(46)	12.6%	Expected Net Trend Since Last Rate Review (Value receives complement of credibility)
(47)	**123.6%**	**Credibility-Weighted Rate Level Indication**
(48)	**9.9%**	**Company Selected Rate Change** (SUPPORT!)

Commercial Non Residential Wind-only Policies
Premium on-level factors

	(1) Effective Date of Rate Changes	Days Remaining in Current Year	Days Remaining in Next Year	(2) Average Rate Change	(3) Average Rate Level	(4) Percent of Earned Premium by Rate Level, Calendar Year Ending: 12/31/04	(5) 12/31/05	(6) 12/31/06	(7) 12/31/07	(8) 12/31/08
	2/1/08	334	31	15.000%	1.150	[redacted]				0.419
Prior to					1.000	1.000	1.000	1.000	1.000	0.581

		(4)	(5)	(6)	(7)	(8)
(9)	**Average Rate Level Index:**	1.000	1.000	1.000	1.000	1.063
(10)	**Current Rate Level Index:**	1.150	1.150	1.150	1.150	1.150
(11)	**Premium On-Level Factor:**	1.150	1.150	1.150	1.150	1.082

Notes:

(1) Equal to "new" and "renewal" effective dates from filing 07-18275
(2) Average Rate change from filing 07-18275
(3) For Prior, the average rate level is defined to be 1.000
For other rows, the average rate level equals [1+(2)] times [(3) for subsequent row]
(4) to (8) Based on effective dates of rate changes in (1).
(9) A weighted average of (3) using Columns (4) through (8) as weights
(10) = (3) for the most recent rate change
(11) = (10) / (9)

Commercial Non Residential Wind-only Policies
Earned Premiums, Earned House Years, and Written Premiums

		(1)	(2)	(3)	(4)	(5)
Beginning of Calendar Year	End of Calendar Year	Earned House Years	Written Premium	Earned Premium	On-Level Factor	Earned Premium at Current Rates
1/1/2004	12/31/2004	31,374	31,080,840	30,316,786	1.150	34,864,304
1/1/2005	12/31/2005	31,538	33,371,016	31,748,446	1.150	36,510,713
1/1/2006	12/31/2006	36,783	50,629,872	42,510,820	1.150	48,887,443
1/1/2007	12/31/2007	42,325	56,738,327	54,178,340	1.150	62,305,091
1/1/2008	12/31/2008	42,096	62,194,102	59,293,557	1.082	64,158,363
Total		184,116	234,014,157	218,047,949		246,725,914

Notes:

(1) From database
(2) From database
(3) From database
(4) From Exhibit "4A", Row (11)
(5) = (3)(4)*

Commercial Non Residential Wind-only Policies
Actual Incurred Losses

		(1)	(2)	(3)	(4)
Beginning of Calendar Year	**End of Calendar Year**	**Total Losses**	**Non-Hurr. Catastrophe Losses**	**Hurricane Catastrophe Losses**	**Losses Excluding Catastrophes**
1/1/2004	12/31/2004	231,335,075	0	231,187,416	147,659
1/1/2005	12/31/2005	270,511,002	0	269,428,220	1,082,782
1/1/2006	12/31/2006	476,144	32,870	0	443,274
1/1/2007	12/31/2007	820,396	0	0	820,396
1/1/2008	12/31/2008	1,683,184	1,453,502	0	229,682
Total		504,825,801	1,486,372	500,615,636	2,723,793

Notes:

(1) From database
(2) From database
(3) From database
(4) = (1) - (2) - (3)

Commercial Non Residential Wind-only Policies
Actual Incurred ALAE

		(1)	(2)	(3)	(4)
Beginning of Calendar Year	End of Calendar Year	Total ALAE	Non-Hurr. Catastrophe ALAE	Hurricane Catastrophe ALAE	ALAE Excluding Catastrophes
1/1/2004	12/31/2004	8,679,566	0	8,648,528	31,038
1/1/2005	12/31/2005	11,465,484	0	11,393,440	72,044
1/1/2006	12/31/2006	30,155	175	0	29,980
1/1/2007	12/31/2007	60,005	0	0	60,005
1/1/2008	12/31/2008	57,582	44,438	0	13,144
Total		20,292,792	44,613	20,041,968	206,211

Notes:
(1) From database
(2) From database
(3) From database
(4) = (1) - (2) - (3)

Ratio of Paid LAE To Paid Losses
All Lines Combined

		(1)	(2)	(3)	(4)
Beginning of Accident Year	End of Accident Year	Paid Losses	Paid D&CC Expenses	Paid A&O Expenses	Ratio of LAE to Losses
1/1/2004	12/31/2004	3,221,738,000	42,055,000	195,657,000	7.4%
1/1/2005	12/31/2005	2,930,508,000	92,579,000	285,317,000	12.9%
1/1/2006	12/31/2006	285,390,000	12,188,000	29,419,000	14.6%
1/1/2007	12/31/2007	489,903,000	7,317,000	58,320,000	13.4%
1/1/2008	12/31/2008	366,740,000	2,237,000	44,198,000	12.7%

Notes:

(1) From Schedule P, Part 1, - Summary, Column (4) of Citizens' 2008 Annual Statement.
(2) From Schedule P, Part 1, - Summary, Column (6) of Citizens' 2008 Annual Statement.
(3) From Schedule P, Part 1, - Summary, Column (8) of Citizens' 2008 Annual Statement.
(4) = [(2) + (3)] / (1)

Commercial Non Residential Wind-only Policies
Actual Incurred ULAE Excl. Cats Losses

Accident Year	(1) Ratio of LAE to Loses	(2) Incurred ALAE	(3) Total Incurred Losses	(4) Hurricane Incurred Losses	(5) Non-Cat Incurred Losses	(6) Non-Hurricane Cat Incurred Losses	(7) Ratio of Total Incurred ALAE to Incurred Losses	(8) Ratio of Total Incurred ULAE to Incurred Losses	(9) Total Incurred ULAE	(10) Ratio of Total Non-Hurricane ULAE to Losses	(11) Ratio of Total Hurricane ULAE to Losses	(12) Selected Non-Hurricane ULAE	(13) Selected Hurricane ULAE	(14) Selected Non-Hurricane Cat. ULAE	(15) Selected ULAE Excluding Cats.
2004	7.4%	8,679,566	231,335,075	231,187,416	147,659	0	3.8%	3.6%	8,389,210	1.2%	3.6%	1,786	8,387,424	0	1,786
2005	12.9%	11,465,484	270,511,002	269,428,220	1,082,782	0	4.2%	8.7%	23,417,555	2.9%	8.7%	31,328	23,386,227	0	31,328
2006	14.6%	30,155	476,144	0	443,274	32,870	6.3%	8.2%	39,262	8.2%	0.0%	39,262	0	2,710	36,552
2007	13.4%	60,005	820,396	0	820,396	0	7.3%	6.1%	49,911	6.1%	0.0%	49,911	0	0	49,911
2008	12.7%	57,582	1,683,184	0	229,682	1,453,502	3.4%	9.2%	155,535	9.2%	0.0%	155,535	0	134,311	21,224

Notes:
*

(1) From Exhibit "15A", Column (4)]
(2) Based on information from a loss database.
(3) Based on information from a loss database.
(4) Based on information from a loss database.
(5) Based on information from a loss database.
(6) Based on information from a loss database.
(7) = (2) / (3)
(8) = (1) - (7)
*(9) = (3) * (8)*
*(10) = (9) / {3.0 * (4) + (5) + (6)}. Assuming that the ratio of the hurricane ULAE percentage to the non-hurricane ULAE percentage is 3 to 1.*
*(11) = 3.0 * (10), if (4) = 0, then 0.*
*(12) = (10) * {(5) + (6)}*
*(13) = (11) * (4)*
*(14) = (12) * (6) / [(3) - (4)]*
(15) = (12) - (14)

Commercial Non Residential Wind-only Policies
Estimate of Ratio of Projected Non-Hurricane Catastrophe Losses to Hurricane Losses

	(1)	(2)	(3)
Multiperil Line	**Projected Hurricane Loss & LAE Ratio**	**Projected Non-Hurricane Catstrophe Loss & LAE Ratio**	**(2)/(1)**
CRM	58.2%	0.4%	0.7%

Notes:

(1) Hurricane Loss and LAE ratio from CRM filing.
(2) Non-Hurricane Catatrophe Loss and LAE ratio from CRM filing.
(3) = (2) / (1)

Commercial Non Residential Wind-only Policies
Estimate of ALAE, ULAE to Loss Ratios for Non-Hurricane Catastrophes

Wind-Only Line	(1) Historical Incurred Losses	(2) Historical Incurred ALAE	(3) Historical Incurred ULAE	(4) Projected Ratio of Incurred Losses to Losses & LAE	(5) Projected Ratio of Incurred ALAE to Losses & LAE	(6) Projected Ratio of Incurred ULAE to Losses & LAE
CNRW	504,825,801	20,292,792	32,051,473	0.906	0.036	0.058

Notes:
(1) Sum of Exhibit "7-9", Column (1)
(2) Sum of Exhibit "11-13", Column (1)
(3) Sum of Exhibit "15B", Column (9)
(4) = (1) / [(1) + (2) + (3)]
(5) = (2) / [(1) + (2) + (3)]
(6) = (3) / [(1) + (2) + (3)]

Commercial Non Residential Wind-only Policies
Estimate of Non-Hurricane Catastrophes ALAE, ULAE and Loss Ratios

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Wind-Only Line	Projected Hurricane Loss & LAE Ratio	Projected Ratio of Non-Hurricane Cat Loss & LAE to Hurricane Loss & LAE	Historical Ratio of Losses to Losses & LAE	Historical Ratio of ALAE to Losses & LAE	Historical Ratio of ULAE to Losses & LAE	Projected Non-Hurricane Catastrophe Loss Ratio	Projected Non-Hurricane Catastrophe ALAE Ratio	Projected Non-Hurricane Catastrophe ULAE Ratio
CNRW	142.0%	0.7%	0.906	0.036	0.058	0.9%	0.0%	0.1%

Notes:
(1) From Exhibit "20-22B", Row (3)
(2) From Exhibit "17-19A", Column (3)
(3) From Exhibit "17-19B", Column (4)
(4) From Exhibit "17-19B", Column (5)
(5) From Exhibit "17-19B", Column (6)
*(6) = (1) * (2) * (3)*
*(7) = (1) * (2) * (4)*
*(8) = (1) * (2) * (5)*

Commercial Non Residential Wind-only Policies
Selected Hurricane LAE Ratios

Beginning of Accident Year	End of Accident Year	(1) Actual Incurred Hurricane Catastrophe Losses	(2) Actual Incurred Hurricane Catastrophe ALAE	(3) Actual Incurred Hurricane Catastrophe ULAE	(4) Hurricane LAE Ratio	(5) Hurricane ALAE Ratio	(6) Hurricane ULAE Ratio
1/1/2004	12/31/2004	231,187,416	8,648,528	8,387,424	7.4%	3.7%	3.6%
1/1/2005	12/31/2005	269,428,220	11,393,440	23,386,227	12.9%	4.2%	8.7%
1/1/2006	12/31/2006	0	0	0	N/A	N/A	N/A
1/1/2007	12/31/2007	0	0	0	N/A	N/A	N/A
1/1/2008	12/31/2008	0	0	0	N/A	N/A	N/A
Total		**500,615,636**	**20,041,968**	**31,773,651**	**10.4%**	**4.0%**	**6.3%**

(7)Selected Hurricane LAE Ratio:	**10.4%**
(8)Selected Hurricane ALAE Ratio:	**4.0%**
(9)Selected Hurricane ULAE Ratio:	**6.3%**

Notes:
(1) From Exhibit "7-9", Column (3)
(2) From Exhibit "11-13", Column (3)
(3) From Exhibit "15B", Column (13)
(4) = [(2)+(3)]/(1)
(5) = (2) / (1)
(6) = (3) / (1)
(7) = Total of Column (4)
(8) = Total of Column (5)
(9) = Total of Column (6)

Commercial Non Residential Wind-only Policies
Projected Hurricane Loss Ratio
For Policies Inforce on 12/31/2008

(1)	12/31/2008 Inforce total premium adjusted to current rates	62,535,201
(2)	Modeled average annual hurricane losses	88,792,662
(3)	Projected Hurricane Loss Ratio	142.0%

Notes:

(1) Inforce premium at current rates. Refer to Appendix A for on-leveling of 12/31/2008 inforce premium.
(2) RMS version 6.0b results. Includes demand surge.
(3) = (2) / (1)

Commercial Non Residential Wind-only Policies
Projected Hurricane Losses and LAE

		(1)	(2)	(3)	(4)	(5)	(6)	(7)
Beginning of Calendar Year	End of Calendar Year	Projected Earned Premium	Selected Hurricane Loss Ratio	Hurricane Catastrophe Loss	Selected ALAE Factor	Selected ULAE Factor	Hurricane Catastrophe ALAE	Hurricane Catastrophe ULAE
1/1/2004	12/31/2004	60,969,193	1.420	86,569,115	0.040	0.063	3,465,764	5,494,469
1/1/2005	12/31/2005	58,592,252	1.420	83,194,136	0.040	0.063	3,330,647	5,280,261
1/1/2006	12/31/2006	71,995,876	1.420	102,225,713	0.040	0.063	4,092,570	6,488,180
1/1/2007	12/31/2007	84,202,359	1.420	119,557,490	0.040	0.063	4,786,441	7,588,213
1/1/2008	12/31/2008	79,550,371	1.420	112,952,210	0.040	0.063	4,522,001	7,168,981
Total		355,310,051		504,498,664			20,197,424	32,020,104

Notes:

(1) From Exhibit "RIF Duplicate", Column (6)
(2) From Exhibit "20-22B", Row (3)
(3) (1)(2)*
(4) From Exhibit "20-22A", Row (8)
(5) From Exhibit "20-22A", Row (9)
*(6) = (3) * (4)*
*(7) = (3) * (5)*

Citizens Property Insurance Corporation
High-Risk Account - Wind Only Policies
Incurred Losses & ALAE Excluding 2004 & 2005 Hurricanes
March 31, 2009 Reserve Review

AY	12	24	36	48	60	72	84	96	108	120
1999	43,865,512	47,929,721	51,462,769	51,462,837	51,817,502	51,858,779	52,746,409	52,850,987	53,075,998	53,615,868
2000	4,288,654	5,742,717	5,934,477	5,955,926	6,022,695	6,036,092	6,036,963	6,036,138	6,026,993	
2001	20,012,582	25,796,138	26,875,235	27,043,757	27,381,222	27,401,781	27,412,388	27,396,951		
2002	3,061,968	3,502,913	3,585,255	3,605,090	3,667,611	3,662,927	3,662,927			
2003	7,866,505	8,790,886	9,517,834	9,436,562	9,454,585	9,484,186				
2004	15,179,171	14,830,668	14,183,127	11,664,991	11,667,288					
2005	9,954,324	11,374,859	10,018,799	10,114,310						
2006	4,060,706	7,895,412	8,382,845							
2007	4,862,384	5,523,121								
2008	4,015,454									

AY	12:24	24:36	36:48	48:60	60:72	72:84	84:96	96:108	108:120	
1999	1.0927	1.0737	1.0000	1.0069	1.0008	1.0171	1.0020	1.0043	1.0102	
2000	1.3390	1.0334	1.0036	1.0112	1.0022	1.0001	0.9999	0.9985		
2001	1.2890	1.0418	1.0063	1.0125	1.0008	1.0004	0.9994			
2002	1.1440	1.0235	1.0055	1.0173	0.9987	1.0000				
2003	1.1175	1.0827	0.9915	1.0019	1.0031					
2004	0.9770	0.9563	0.8225	1.0002						
2005	1.1427	0.8808	1.0095							
2006	1.9443	1.0617								
2007	1.1359									
Average All	1.2425	1.0192	0.9770	1.0083	1.0011	1.0044	1.0004	1.0014	1.0102	
Avg x Hi/Lo	1.1801	1.0318	1.0014	1.0081	1.0013	1.0003	0.9999			
Last 3	1.4076	0.9663	0.9411	1.0065	1.0009	1.0002	1.0004			
Weighted Average	1.1612	1.0326	0.9811	1.0077	1.0010	1.0101	1.0010	1.0037	1.0102	
Weighted Last 3	1.3134	0.9555	0.9257	1.0034	1.0011	1.0003	1.0010			
Selected	1.1500	1.0200	1.0100	1.0080	1.0030	1.0020	*1.0003*	*1.0000*	*1.0000*	1.0000
Cumu DevFac	1.2006	1.0440	1.0235	1.0134	1.0054	1.0024	1.0004	1.0001	1.0000	1.0000

	15	27	39	51	63	75	87	99	111	123
LDF to Ultimate	1.1358	1.0376	1.0204	1.0107	1.0044	1.0015	1.0002	1.0000	1.0000	1.0000

Summary of Citizens Expense Experience as Reported in the IEE
Total Allied Line Experience (dollar amounts are in thousands)

Year	(1) Direct Written Premium	(2) Direct Earned Premium	(3) Other Acquisition Expenses Incurred	(4) Other Acquisition Expense Ratio
2005	1,046,543	952,810	5,511	0.6%
2006	1,881,253	1,492,526	7,827	0.5%
2007	1,635,168	1,676,100	9,373	0.6%
2008	1,107,686	1,282,867	5,599	0.4%
Average				0.5%
Selection				**0.4%**

Year	(5) General Expenses Incurred	(6) General Expense Ratio	(7) Taxes, Licenses, and Fees Incurred	(8) Taxes, Licenses, and Fees Ratio
2005	32,877	3.5%	16,901	1.6%
2006	50,427	3.4%	1,815	0.1%
2007	56,243	3.4%	61,974	3.8%
2008	68,033	5.3%	23,351	2.1%
Average		4.0%		1.9%
Selection		**5.3%**		**2.1%**

Notes:

(1) From Citizens' Insurance Expense Exhibit.
(2) From Citizens' Insurance Expense Exhibit.
(3) From Citizens' Insurance Expense Exhibit.
(4) = (3) / (2)
(5) From Citizens' Insurance Expense Exhibit.
(6) = (5) / (2)
(7) From Citizens' Insurance Expense Exhibit.
(8) = (7) / (1)

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CALCULATION OF INFORCE PREMIUM AT CURRENT RATE LEVEL
FRAME CONSTRUCTION

		(1)	(2)	(3)	(4)
County	Territory Number	12/31/2008 Inforce Premium for Policies with Effective Dates Prior to 2/1/2008	12/31/2008 Inforce Premium for Policies with Effective Dates After 1/31/2008	2/1/2008 Percentage Rate Change	12/31/2008 Inforce Premium (at current rate level)
Bay	59	6,202	251,494	10.2%	258,330
Brevard	60	2,366	76,976	10.3%	79,585
Broward	35	9,010	127,333	17.8%	137,950
Broward	36	0	1,579	19.6%	1,579
Broward	37	3,143	93,948	12.9%	97,496
Charlotte	61	0	12,806	18.9%	12,806
Collier	62	541	137,006	18.2%	137,646
Dade	30	0	23,398	18.5%	23,398
Dade	31	26,146	22,765	16.7%	53,281
Dade	32	1,926	19,465	14.9%	21,678
Dade	34	2,811	154,111	12.8%	157,283
Duval	41	664	20,432	10.0%	21,162
Escambia	43	18,704	611,426	10.1%	632,023
Escambia	63	434	73,122	17.5%	73,632
Flagler	64	0	26,984	10.0%	26,984
Flagler	78	0	816	10.0%	816
Franklin	65	0	66,513	12.9%	66,513
Gulf	66	0	22,178	11.1%	22,178
Hernando	56	1,537	2,207	10.0%	3,898
Indian River	76	40,879	43,021	10.2%	88,064
Lee	67	60,669	678,118	18.5%	750,010
Lee	79	1,044	22,909	10.4%	24,062
Levy	57	959	33,946	10.0%	35,001
Manatee	68	3,705	74,986	18.4%	79,374
Monroe	85	12,496	703,179	13.9%	717,412
Monroe	86	136,843	1,664,763	19.3%	1,827,998
Nassau	69	0	10,009	10.0%	10,009
Okaloosa	70	0	61,061	12.4%	61,061
Palm Beach	38	22,100	333,257	11.0%	357,781
Palm Beach	87	2,529	168,488	18.2%	171,477
Pasco	88	0	42,627	10.1%	42,627
Pinellas	42	13,257	101,970	18.0%	117,615
Saint Johns	71	3,607	48,226	10.0%	52,194
Saint Lucie	77	0	5,487	10.0%	5,487
Santa Rosa	72	0	9,546	18.0%	9,546
Santa Rosa	80	2,281	58,760	18.0%	61,451
Sarasota	73	23,355	221,272	10.4%	247,053
Sarasota	81	7,216	99,307	11.1%	107,322
Volusia	44	12,337	169,256	10.0%	182,828
Volusia	74	3,693	109,275	10.1%	113,341
Wakulla	58	1,938	3,932	10.0%	6,064
Walton	75	28,016	449,059	10.2%	479,944
Total		**450,408**	**6,857,013**		**7,375,959**

Notes:
(1) Based on information from an exposure database.
(2) Based on information from an exposure database.
(3) Based on information from filing # 07-18275.
*(4) = {(1) * [1.0 + (3)] + (2)}*

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CALCULATION OF INFORCE PREMIUM AT CURRENT RATE LEVEL
MASONRY CONSTRUCTION

County	Territory Number	(1) 12/31/2008 Inforce Premium for Policies with Effective Dates Prior to 2/1/2008	(2) 12/31/2008 Inforce Premium for Policies with Effective Dates After 1/31/2008	(3) 2/1/2008 Percentage Rate Change	(4) 12/31/2008 Inforce Premium (at current rate level)
Bay	59	7,867	380,415	10.2%	389,087
Brevard	60	9,579	397,478	10.3%	408,039
Broward	35	185,396	2,906,633	17.8%	3,125,103
Broward	36	35,056	877,747	19.6%	919,669
Broward	37	108,656	2,621,438	12.9%	2,744,098
Charlotte	61	0	23,859	18.9%	23,859
Collier	62	15,750	447,251	18.2%	465,875
Dade	30	262,910	1,959,674	18.5%	2,271,262
Dade	31	30,203	378,626	16.7%	413,877
Dade	32	128,050	1,943,130	14.9%	2,090,246
Dade	34	76,227	2,409,672	12.8%	2,495,686
Duval	41	5,241	94,867	10.0%	100,632
Escambia	43	52,748	803,043	10.1%	861,130
Escambia	63	909	90,341	17.5%	91,409
Flagler	64	2,501	94,895	10.0%	97,646
Flagler	78	0	984	10.0%	984
Franklin	65	1,808	67,575	12.9%	69,616
Gulf	66	773	27,091	11.1%	27,950
Hernando	56	3,156	12,405	10.0%	15,877
Indian River	76	20,493	345,806	10.2%	368,387
Lee	67	32,652	440,721	18.5%	479,413
Lee	79	2,135	68,097	10.4%	70,454
Levy	57	2,610	8,068	10.0%	10,939
Manatee	68	1,914	132,715	18.4%	134,982
Monroe	85	93,763	2,447,427	13.9%	2,554,226
Monroe	86	68,760	1,515,343	19.3%	1,597,364
Nassau	69	0	20,432	10.0%	20,432
Okaloosa	70	589	86,793	12.4%	87,455
Palm Beach	38	271,606	5,222,263	11.0%	5,523,659
Palm Beach	87	17,746	1,176,736	18.2%	1,197,713
Pasco	88	7,525	153,021	10.1%	161,303
Pinellas	42	24,016	766,976	18.0%	795,318
Saint Johns	71	5,489	62,854	10.0%	68,892
Saint Lucie	77	18,605	27,876	10.0%	48,342
Santa Rosa	72	0	1,550	18.0%	1,550
Santa Rosa	80	651	45,092	18.0%	45,860
Sarasota	73	147,271	1,422,926	10.4%	1,585,495
Sarasota	81	68,112	870,454	11.1%	946,111
Volusia	44	38,493	890,327	10.0%	932,673
Volusia	74	24,944	550,647	10.1%	578,114
Wakulla	58	2,708	7,934	10.0%	10,913
Walton	75	7,116	320,640	10.2%	328,485
Total		**1,784,028**	**32,121,822**		**34,160,122**

Notes:

(1) Based on information from an exposure database.
(2) Based on information from an exposure database.
(3) Based on information from filing # 07-18275.
*(4) = {(1) * [1.0 + (3)] + (2)}*

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CALCULATION OF INFORCE PREMIUM AT CURRENT RATE LEVEL
SEMI-WIND RESISTIVE CONSTRUCTION

County	Territory Number	(1) 12/31/2008 Inforce Premium for Policies with Effective Dates Prior to 2/1/2008	(2) 12/31/2008 Inforce Premium for Policies with Effective Dates After 1/31/2008	(3) 2/1/2008 Percentage Rate Change	(4) 12/31/2008 Inforce Premium (at current rate level)
Bay	59	3,577	104,964	10.2%	108,907
Brevard	60	830	74,829	10.3%	75,744
Broward	35	56,816	1,516,083	17.8%	1,583,035
Broward	36	11,209	196,835	19.6%	210,239
Broward	37	66,021	1,610,933	12.9%	1,685,463
Charlotte	61	0	0	18.9%	0
Collier	62	2,594	96,957	18.2%	100,024
Dade	30	11,649	412,475	18.5%	426,281
Dade	31	3,977	100,082	16.7%	104,724
Dade	32	23,854	684,719	14.9%	712,125
Dade	34	80,860	1,108,681	12.8%	1,199,923
Duval	41	2,409	15,571	10.0%	18,221
Escambia	43	3,124	197,635	10.1%	201,075
Escambia	63	0	8,070	17.5%	8,070
Flagler	64	0	3,090	10.0%	3,090
Flagler	78	0	3,832	10.0%	3,832
Franklin	65	0	2,639	12.9%	2,639
Gulf	66	0	579	11.1%	579
Hernando	56	0	0	10.0%	0
Indian River	76	12,870	54,178	10.2%	68,359
Lee	67	5,101	50,429	18.5%	56,474
Lee	79	203	14,479	10.4%	14,703
Levy	57	0	0	10.0%	0
Manatee	68	410	18,724	18.4%	19,210
Monroe	85	8,863	346,190	13.9%	356,285
Monroe	86	2,845	251,690	19.3%	255,084
Nassau	69	0	832	10.0%	832
Okaloosa	70	0	13,086	12.4%	13,086
Palm Beach	38	132,405	2,606,939	11.0%	2,753,866
Palm Beach	87	27,419	430,629	18.2%	463,041
Pasco	88	10,388	32,384	10.1%	43,817
Pinellas	42	19,144	92,545	18.0%	115,137
Saint Johns	71	0	9,285	10.0%	9,285
Saint Lucie	77	0	6,568	10.0%	6,568
Santa Rosa	72	0	1,853	18.0%	1,853
Santa Rosa	80	718	53,328	18.0%	54,175
Sarasota	73	16,585	325,581	10.4%	343,889
Sarasota	81	17,495	251,720	11.1%	271,153
Volusia	44	11,885	191,480	10.0%	204,555
Volusia	74	17,706	131,011	10.1%	150,508
Wakulla	58	0	5,072	10.0%	5,072
Walton	75	2,596	150,472	10.2%	153,334
Total		**553,553**	**11,176,449**		**11,804,255**

Notes:

(1) Based on information from an exposure database.
(2) Based on information from an exposure database.
(3) Based on information from filing # 07-18275.
*(4) = {(1) * [1.0 + (3)] + (2)}*

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CALCULATION OF INFORCE PREMIUM AT CURRENT RATE LEVEL
WIND RESISTIVE CONSTRUCTION

County	Territory Number	(1) 12/31/2008 Inforce Premium for Policies with Effective Dates Prior to 2/1/2008	(2) 12/31/2008 Inforce Premium for Policies with Effective Dates After 1/31/2008	(3) 2/1/2008 Percentage Rate Change	(4) 12/31/2008 Inforce Premium (at current rate level)
Bay	59	947	89,990	10.2%	91,034
Brevard	60	4,767	66,846	10.3%	72,102
Broward	35	38,546	846,214	17.8%	891,636
Broward	36	34,845	346,959	19.6%	388,629
Broward	37	37,988	690,625	12.9%	733,509
Charlotte	61	0	2,732	18.9%	2,732
Collier	62	4,761	93,886	18.2%	99,516
Dade	30	21,804	791,007	18.5%	816,848
Dade	31	6,952	324,837	16.7%	332,951
Dade	32	43,717	1,197,498	14.9%	1,247,724
Dade	34	71,427	899,823	12.8%	980,421
Duval	41	0	3,033	10.0%	3,033
Escambia	43	0	35,166	10.1%	35,166
Escambia	63	0	52,406	17.5%	52,406
Flagler	64	1,934	614	10.0%	2,741
Flagler	78	0	962	10.0%	962
Franklin	65	0	200	12.9%	200
Gulf	66	0	532	11.1%	532
Hernando	56	0	0	10.0%	0
Indian River	76	1,404	27,992	10.2%	29,539
Lee	67	3,272	56,778	18.5%	60,655
Lee	79	0	2,789	10.4%	2,789
Levy	57	0	528	10.0%	528
Manatee	68	0	200	18.4%	200
Monroe	85	12,856	541,491	13.9%	556,134
Monroe	86	2,320	318,315	19.3%	321,082
Nassau	69	0	0	10.0%	0
Okaloosa	70	2,173	53,078	12.4%	55,521
Palm Beach	38	96,772	1,425,703	11.0%	1,533,089
Palm Beach	87	3,149	190,565	18.2%	194,287
Pasco	88	0	10,638	10.1%	10,638
Pinellas	42	2,750	120,106	18.0%	123,351
Saint Johns	71	0	8,866	10.0%	8,866
Saint Lucie	77	0	1,335	10.0%	1,335
Santa Rosa	72	0	200	18.0%	200
Santa Rosa	80	0	10,381	18.0%	10,381
Sarasota	73	1,538	68,659	10.4%	70,357
Sarasota	81	13,237	86,790	11.1%	101,493
Volusia	44	2,517	82,626	10.0%	85,395
Volusia	74	10,590	181,165	10.1%	192,826
Wakulla	58	0	0	10.0%	0
Walton	75	0	84,055	10.2%	84,055
Total		**420,266**	**8,715,590**		**9,194,864**

Notes:

(1) Based on information from an exposure database.
(2) Based on information from an exposure database.
(3) Based on information from filing # 07-18275.
*(4) = {(1) * [1.0 + (3)] + (2)}*

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CALCULATION OF INFORCE PREMIUM AT CURRENT RATE LEVEL
ALL CONSTRUCTION TYPES COMBINED

County	Territory Number	(1) FRM 12/31/2008 Inforce Premium at Current Rate Level	(2) MAS 12/31/2008 Inforce Premium at Current Rate Level	(3) SWR 12/31/2008 Inforce Premium at Current Rate Level	(4) WR 12/31/2008 Inforce Premium at Current Rate Level	(5) Total 12/31/2008 Inforce Premium at Current Rate Level
Bay	59	258,330	389,087	108,907	91,034	847,358
Brevard	60	79,585	408,039	75,744	72,102	635,470
Broward	35	137,950	3,125,103	1,583,035	891,636	5,737,725
Broward	36	1,579	919,669	210,239	388,629	1,520,117
Broward	37	97,496	2,744,098	1,685,463	733,509	5,260,567
Charlotte	61	12,806	23,859	0	2,732	39,397
Collier	62	137,646	465,875	100,024	99,516	803,061
Dade	30	23,398	2,271,262	426,281	816,848	3,537,788
Dade	31	53,281	413,877	104,724	332,951	904,833
Dade	32	21,678	2,090,246	712,125	1,247,724	4,071,772
Dade	34	157,283	2,495,686	1,199,923	980,421	4,833,312
Duval	41	21,162	100,632	18,221	3,033	143,048
Escambia	43	632,023	861,130	201,075	35,166	1,729,394
Escambia	63	73,632	91,409	8,070	52,406	225,517
Flagler	64	26,984	97,646	3,090	2,741	130,462
Flagler	78	816	984	3,832	962	6,594
Franklin	65	66,513	69,616	2,639	200	138,968
Gulf	66	22,178	27,950	579	532	51,239
Hernando	56	3,898	15,877	0	0	19,774
Indian River	76	88,064	368,387	68,359	29,539	554,349
Lee	67	750,010	479,413	56,474	60,655	1,346,551
Lee	79	24,062	70,454	14,703	2,789	112,008
Levy	57	35,001	10,939	0	528	46,468
Manatee	68	79,374	134,982	19,210	200	233,765
Monroe	85	717,412	2,554,226	356,285	556,134	4,184,058
Monroe	86	1,827,998	1,597,364	255,084	321,082	4,001,528
Nassau	69	10,009	20,432	832	0	31,273
Okaloosa	70	61,061	87,455	13,086	55,521	217,123
Palm Beach	38	357,781	5,523,659	2,753,866	1,533,089	10,168,394
Palm Beach	87	171,477	1,197,713	463,041	194,287	2,026,519
Pasco	88	42,627	161,303	43,817	10,638	258,385
Pinellas	42	117,615	795,318	115,137	123,351	1,151,421
Saint Johns	71	52,194	68,892	9,285	8,866	139,237
Saint Lucie	77	5,487	48,342	6,568	1,335	61,732
Santa Rosa	72	9,546	1,550	1,853	200	13,149
Santa Rosa	80	61,451	45,860	54,175	10,381	171,867
Sarasota	73	247,053	1,585,495	343,889	70,357	2,246,794
Sarasota	81	107,322	946,111	271,153	101,493	1,426,080
Volusia	44	182,828	932,673	204,555	85,395	1,405,450
Volusia	74	113,341	578,114	150,508	192,826	1,034,789
Wakulla	58	6,064	10,913	5,072	0	22,049
Walton	75	479,944	328,485	153,334	84,055	1,045,818
Total		**7,375,959**	**34,160,122**	**11,804,255**	**9,194,864**	**62,535,201**

Notes:

(1) From Exhibit A, Page 1, Column (4)
(2) From Exhibit A, Page 2, Column (4)
(3) From Exhibit A, Page 3, Column (4)
(4) From Exhibit A, Page 4, Column (4)
(5) = (1) + (2) + (3) + (4)

Exhibit	Description
E1, P1	Shows expected loss & LAE for each territory based on public model
E1, P2	For each territory, shows total loss ratio, and hurricane-only loss-ratio relative to average
E1, P3	Notes for "E1, P1" and "E1, P2"
E2, P1	For each territory, shows expense ratios
E2, P2	For each territory, finds proposed rate change based on overall indicated rate change and expense ratios
E2, P3	Notes for "E2, P1" and "E2, P2"
E3, P1	Current CC-D base rates
E3, P2	Current CC-E base rates
E3, P3	Current CC-F base rates
E3, P4	Current CC-G base rates
E3, P5	Current CC-H base rates
E4, P1	Proposed CC-D base rates
E4, P2	Proposed CC-E base rates
E4, P3	Proposed CC-F base rates
E4, P4	Proposed CC-G base rates
E4, P5	Proposed CC-H base rates

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
PROJECTED TERRITORIAL HURRICANE LOSS AND LAE
BASED ON RMS VERSION 6.0b HURRICANE MODEL

County	Territory Number	(1) Expected Annual Hurricane Losses	(2) LAE Factor	(3) Projected Hurricane Loss and LAE
Bay	59	706,046	1.104	779,124
Brevard	60	891,113	1.104	983,347
Broward	35	6,888,034	1.104	7,600,971
Broward	36	3,025,378	1.104	3,338,516
Broward	37	6,465,532	1.104	7,134,740
Charlotte	61	103,915	1.104	114,670
Collier	62	1,382,295	1.104	1,525,367
Dade	30	5,720,621	1.104	6,312,727
Dade	31	1,731,285	1.104	1,910,479
Dade	32	5,247,946	1.104	5,791,128
Dade	34	5,583,018	1.104	6,160,882
Duval	41	60,523	1.104	66,787
Escambia	43	2,806,009	1.104	3,096,441
Escambia	63	344,655	1.104	380,328
Flagler	64	65,335	1.104	72,097
Flagler	78	3,852	1.104	4,251
Franklin	65	132,678	1.104	146,411
Gulf	66	45,347	1.104	50,041
Hernando	56	15,131	1.104	16,698
Indian River	76	618,009	1.104	681,976
Lee	67	3,117,316	1.104	3,439,970
Lee	79	149,262	1.104	164,711
Levy	57	63,139	1.104	69,674
Manatee	68	670,462	1.104	739,857
Monroe	85	8,232,456	1.104	9,084,546
Monroe	86	7,074,485	1.104	7,806,721
Nassau	69	15,772	1.104	17,404
Okaloosa	70	309,840	1.104	341,910
Palm Beach	38	13,179,526	1.104	14,543,657
Palm Beach	87	3,248,518	1.104	3,584,752
Pasco	88	161,926	1.104	178,686
Pinellas	42	2,586,690	1.104	2,854,422
Saint Johns	71	74,777	1.104	82,517
Saint Lucie	77	93,109	1.104	102,747
Santa Rosa	72	22,086	1.104	24,372
Santa Rosa	80	369,413	1.104	407,649
Sarasota	73	3,191,201	1.104	3,521,503
Sarasota	81	2,008,558	1.104	2,216,451
Volusia	44	741,288	1.104	818,014
Volusia	74	926,676	1.104	1,022,590
Wakulla	58	20,218	1.104	22,311
Walton	75	699,221	1.104	771,593
TOTAL		**88,792,662**		**97,983,039**

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
PROJECTED TERRITORIAL TOTAL LOSS AND LAE RATIOS
BASED ON RMS VERSION 6.0b HURRICANE MODEL

		(1)	(2)	(3)	(4)	(5)	(6)	(7)
County	**Territory Number**	**12/31/2008 Inforce Premium (at current rate level)**	**Projected Hurricane Loss and LAE**	**Projected Hurricane Loss and LAE Ratio**	**Factor for Non-Hurricane Catastrophe Losses**	**Non-Cat Loss Ratio**	**Total Loss Ratio**	**RMSv6.0b Relativity**
Bay	59	847,358	779,124	91.9%	1.007	1.8%	94.3%	0.587
Brevard	60	635,470	983,347	154.7%	1.007	1.8%	157.6%	0.988
Broward	35	5,737,725	7,600,971	132.5%	1.007	1.8%	135.1%	0.845
Broward	36	1,520,117	3,338,516	219.6%	1.007	1.8%	222.9%	1.402
Broward	37	5,260,567	7,134,740	135.6%	1.007	1.8%	138.3%	0.866
Charlotte	61	39,397	114,670	291.1%	1.007	1.8%	294.8%	1.858
Collier	62	803,061	1,525,367	189.9%	1.007	1.8%	193.0%	1.212
Dade	30	3,537,788	6,312,727	178.4%	1.007	1.8%	181.4%	1.139
Dade	31	904,833	1,910,479	211.1%	1.007	1.8%	214.3%	1.348
Dade	32	4,071,772	5,791,128	142.2%	1.007	1.8%	145.0%	0.908
Dade	34	4,833,312	6,160,882	127.5%	1.007	1.8%	130.1%	0.814
Duval	41	143,048	66,787	46.7%	1.007	1.8%	48.8%	0.298
Escambia	43	1,729,394	3,096,441	179.0%	1.007	1.8%	182.0%	1.143
Escambia	63	225,517	380,328	168.6%	1.007	1.8%	171.6%	1.076
Flagler	64	130,462	72,097	55.3%	1.007	1.8%	57.4%	0.353
Flagler	78	6,594	4,251	64.5%	1.007	1.8%	66.7%	0.411
Franklin	65	138,968	146,411	105.4%	1.007	1.8%	107.8%	0.672
Gulf	66	51,239	50,041	97.7%	1.007	1.8%	100.1%	0.623
Hernando	56	19,774	16,698	84.4%	1.007	1.8%	86.8%	0.539
Indian River	76	554,349	681,976	123.0%	1.007	1.8%	125.6%	0.785
Lee	67	1,346,551	3,439,970	255.5%	1.007	1.8%	259.0%	1.630
Lee	79	112,008	164,711	147.1%	1.007	1.8%	149.8%	0.939
Levy	57	46,468	69,674	149.9%	1.007	1.8%	152.7%	0.957
Manatee	68	233,765	739,857	316.5%	1.007	1.8%	320.4%	2.020
Monroe	85	4,184,058	9,084,546	217.1%	1.007	1.8%	220.4%	1.386
Monroe	86	4,001,528	7,806,721	195.1%	1.007	1.8%	198.2%	1.245
Nassau	69	31,273	17,404	55.7%	1.007	1.8%	57.8%	0.355
Okaloosa	70	217,123	341,910	157.5%	1.007	1.8%	160.3%	1.005
Palm Beach	38	10,168,394	14,543,657	143.0%	1.007	1.8%	145.8%	0.913
Palm Beach	87	2,026,519	3,584,752	176.9%	1.007	1.8%	179.9%	1.129
Pasco	88	258,385	178,686	69.2%	1.007	1.8%	71.4%	0.441
Pinellas	42	1,151,421	2,854,422	247.9%	1.007	1.8%	251.4%	1.582
Saint Johns	71	139,237	82,517	59.3%	1.007	1.8%	61.4%	0.378
Saint Lucie	77	61,732	102,747	166.4%	1.007	1.8%	169.3%	1.062
Santa Rosa	72	13,149	24,372	185.4%	1.007	1.8%	188.4%	1.183
Santa Rosa	80	171,867	407,649	237.2%	1.007	1.8%	240.6%	1.514
Sarasota	73	2,246,794	3,521,503	156.7%	1.007	1.8%	159.6%	1.000
Sarasota	81	1,426,080	2,216,451	155.4%	1.007	1.8%	158.2%	0.992
Volusia	44	1,405,450	818,014	58.2%	1.007	1.8%	60.4%	0.371
Volusia	74	1,034,789	1,022,590	98.8%	1.007	1.8%	101.3%	0.631
Wakulla	58	22,049	22,311	101.2%	1.007	1.8%	103.6%	0.646
Walton	75	1,045,818	771,593	73.8%	1.007	1.8%	76.0%	0.471
TOTAL		**62,535,201**	**97,983,039**	**156.7%**	**1.007**	**1.8%**	**159.5%**	**1.000**

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
FOOTNOTES FOR EXHIBIT 1

Notes for Exhibit 1, Page 1:

(1) Based on information from RMS version 6.0b model.
(2) From Statewide Rate Indication [1.0 + Exhibit "20-22A", Row (7)]
*(3) = (1) * (2)*

Notes for Exhibit 1, Page 2:

(1) From Appendix A, Page 5, Column (5) of Statewide Rate Indicaiton.
(2) From Exhibit 1, Page 1, Column (3).
(3) = (2) / (1).
(4) From Statewide Rate Indication [1.0 + Exhibit "17-19C", Column (2)]
(5) From Statewide Rate Indication [Exhibit "RIF Duplicate" Total of Column (27)] / [Exhibit "RIF Duplicate" Total of Column (6)]
*(6) = (3) * (4) + (5)*
(7) = (3) / [state total for (3)]. State total represents a weighted average with (1) as weights.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
INDICATED FIXED AND VARIABLE EXPENSE COMPONENTS

		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
County	Territory Number	12/31/2008 Inforce Premium (at current rate level)	Hurricane Loss and LAE Relativity	Commission Expense Ratio	Other Acquisition Expense Ratio	General Expense Ratio	Premium Taxes Licenses and Fees Ratio	Net Cost of Non-FHCF Reinsurance	Residual Market Contigency Provision	Fixed Expense Component	Variable Expense Component
Bay	59	847,358	0.587	14.0%	0.4%	5.3%	2.1%	0.0%	5.9%	5.7%	22.0%
Brevard	60	635,470	0.988	14.0%	0.4%	5.3%	2.1%	0.0%	9.9%	5.7%	26.0%
Broward	35	5,737,725	0.845	14.0%	0.4%	5.3%	2.1%	0.0%	8.5%	5.7%	24.6%
Broward	36	1,520,117	1.402	14.0%	0.4%	5.3%	2.1%	0.0%	14.0%	5.7%	30.1%
Broward	37	5,260,567	0.866	14.0%	0.4%	5.3%	2.1%	0.0%	8.7%	5.7%	24.8%
Charlotte	61	39,397	1.858	14.0%	0.4%	5.3%	2.1%	0.0%	18.6%	5.7%	34.7%
Collier	62	803,061	1.212	14.0%	0.4%	5.3%	2.1%	0.0%	12.1%	5.7%	28.2%
Dade	30	3,537,788	1.139	14.0%	0.4%	5.3%	2.1%	0.0%	11.4%	5.7%	27.5%
Dade	31	904,833	1.348	14.0%	0.4%	5.3%	2.1%	0.0%	13.5%	5.7%	29.6%
Dade	32	4,071,772	0.908	14.0%	0.4%	5.3%	2.1%	0.0%	9.1%	5.7%	25.2%
Dade	34	4,833,312	0.814	14.0%	0.4%	5.3%	2.1%	0.0%	8.1%	5.7%	24.2%
Duval	41	143,048	0.298	14.0%	0.4%	5.3%	2.1%	0.0%	3.0%	5.7%	19.1%
Escambia	43	1,729,394	1.143	14.0%	0.4%	5.3%	2.1%	0.0%	11.4%	5.7%	27.5%
Escambia	63	225,517	1.076	14.0%	0.4%	5.3%	2.1%	0.0%	10.8%	5.7%	26.9%
Flagler	64	130,462	0.353	14.0%	0.4%	5.3%	2.1%	0.0%	3.5%	5.7%	19.6%
Flagler	78	6,594	0.411	14.0%	0.4%	5.3%	2.1%	0.0%	4.1%	5.7%	20.2%
Franklin	65	138,968	0.672	14.0%	0.4%	5.3%	2.1%	0.0%	6.7%	5.7%	22.8%
Gulf	66	51,239	0.623	14.0%	0.4%	5.3%	2.1%	0.0%	6.2%	5.7%	22.3%
Hernando	56	19,774	0.539	14.0%	0.4%	5.3%	2.1%	0.0%	5.4%	5.7%	21.5%
Indian River	76	554,349	0.785	14.0%	0.4%	5.3%	2.1%	0.0%	7.9%	5.7%	24.0%
Lee	67	1,346,551	1.630	14.0%	0.4%	5.3%	2.1%	0.0%	16.3%	5.7%	32.4%
Lee	79	112,008	0.939	14.0%	0.4%	5.3%	2.1%	0.0%	9.4%	5.7%	25.5%
Levy	57	46,468	0.957	14.0%	0.4%	5.3%	2.1%	0.0%	9.6%	5.7%	25.7%
Manatee	68	233,765	2.020	14.0%	0.4%	5.3%	2.1%	0.0%	20.2%	5.7%	36.3%
Monroe	85	4,184,058	1.386	14.0%	0.4%	5.3%	2.1%	0.0%	13.9%	5.7%	30.0%
Monroe	86	4,001,528	1.245	14.0%	0.4%	5.3%	2.1%	0.0%	12.5%	5.7%	28.6%
Nassau	69	31,273	0.355	14.0%	0.4%	5.3%	2.1%	0.0%	3.6%	5.7%	19.7%
Okaloosa	70	217,123	1.005	14.0%	0.4%	5.3%	2.1%	0.0%	10.1%	5.7%	26.2%
Palm Beach	38	10,168,394	0.913	14.0%	0.4%	5.3%	2.1%	0.0%	9.1%	5.7%	25.2%
Palm Beach	87	2,026,519	1.129	14.0%	0.4%	5.3%	2.1%	0.0%	11.3%	5.7%	27.4%
Pasco	88	258,385	0.441	14.0%	0.4%	5.3%	2.1%	0.0%	4.4%	5.7%	20.5%
Pinellas	42	1,151,421	1.582	14.0%	0.4%	5.3%	2.1%	0.0%	15.8%	5.7%	31.9%
Saint Johns	71	139,237	0.378	14.0%	0.4%	5.3%	2.1%	0.0%	3.8%	5.7%	19.9%
Saint Lucie	77	61,732	1.062	14.0%	0.4%	5.3%	2.1%	0.0%	10.6%	5.7%	26.7%
Santa Rosa	72	13,149	1.183	14.0%	0.4%	5.3%	2.1%	0.0%	11.8%	5.7%	27.9%
Santa Rosa	80	171,867	1.514	14.0%	0.4%	5.3%	2.1%	0.0%	15.1%	5.7%	31.2%
Sarasota	73	2,246,794	1.000	14.0%	0.4%	5.3%	2.1%	0.0%	10.0%	5.7%	26.1%
Sarasota	81	1,426,080	0.992	14.0%	0.4%	5.3%	2.1%	0.0%	9.9%	5.7%	26.0%
Volusia	44	1,405,450	0.371	14.0%	0.4%	5.3%	2.1%	0.0%	3.7%	5.7%	19.8%
Volusia	74	1,034,789	0.631	14.0%	0.4%	5.3%	2.1%	0.0%	6.3%	5.7%	22.4%
Wakulla	58	22,049	0.646	14.0%	0.4%	5.3%	2.1%	0.0%	6.5%	5.7%	22.6%
Walton	75	1,045,818	0.471	14.0%	0.4%	5.3%	2.1%	0.0%	4.7%	5.7%	20.8%
TOTAL		**62,535,201**	**1.000**	**14.0%**	**0.4%**	**5.3%**	**2.1%**	**0.0%**	**10.0%**	**5.7%**	**26.1%**

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
INDICATED TERRITORIAL RATE CHANGES

Off Balance Factor to keep 0% Change	0.575	Overall Selected Change	123.6%

Min Rate Change Before Off Balance	-20.0%
Max Rate Change Before Off Balance	80.0%

		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
County	Territory Number	12/31/2008 Inforce Premium (at current rate level)	Projected Total Loss & LAE Ratio	Expected Fixed Expense Ratio	Expected Variable Expense Ratio	Indicated Rate Change Before Off Balancing	Capped Indicated Rate Change Before Off Balancing	Indicated Inforce Premium	Selected Off-Balance Base Rate Change	Proposed Total Rate Change	Proposed Capped Rate Change
Bay	59	847,358	94.3%	5.7%	22.0%	28.3%	28.3%	1,086,827	-26.2%	65.0%	10.0%
Brevard	60	635,470	157.6%	5.7%	26.0%	120.6%	80.0%	1,143,845	3.6%	131.6%	10.0%
Broward	35	5,737,725	135.1%	5.7%	24.6%	86.7%	80.0%	10,327,904	3.6%	131.6%	10.0%
Broward	36	1,520,117	222.9%	5.7%	30.1%	227.2%	80.0%	2,736,210	3.6%	131.6%	10.0%
Broward	37	5,260,567	138.3%	5.7%	24.8%	91.5%	80.0%	9,469,021	3.6%	131.6%	10.0%
Charlotte	61	39,397	294.8%	5.7%	34.7%	360.2%	80.0%	70,915	3.6%	131.6%	10.0%
Collier	62	803,061	193.0%	5.7%	28.2%	176.9%	80.0%	1,445,510	3.6%	131.6%	10.0%
Dade	30	3,537,788	181.4%	5.7%	27.5%	158.1%	80.0%	6,368,019	3.6%	131.6%	10.0%
Dade	31	904,833	214.3%	5.7%	29.6%	212.5%	80.0%	1,628,699	3.6%	131.6%	10.0%
Dade	32	4,071,772	145.0%	5.7%	25.2%	101.4%	80.0%	7,329,190	3.6%	131.6%	10.0%
Dade	34	4,833,312	130.1%	5.7%	24.2%	79.3%	79.3%	8,666,398	3.2%	130.7%	10.0%
Duval	41	143,048	48.8%	5.7%	19.1%	-32.6%	-20.0%	114,439	-54.0%	2.9%	2.9%
Escambia	43	1,729,394	182.0%	5.7%	27.5%	159.1%	80.0%	3,112,910	3.6%	131.6%	10.0%
Escambia	63	225,517	171.6%	5.7%	26.9%	142.4%	80.0%	405,931	3.6%	131.6%	10.0%
Flagler	64	130,462	57.4%	5.7%	19.6%	-21.4%	-20.0%	104,369	-54.0%	2.9%	2.9%
Flagler	78	6,594	66.7%	5.7%	20.2%	-9.2%	-9.2%	5,985	-47.8%	16.8%	10.0%
Franklin	65	138,968	107.8%	5.7%	22.8%	47.2%	47.2%	204,529	-15.3%	89.4%	10.0%
Gulf	66	51,239	100.1%	5.7%	22.3%	36.3%	36.3%	69,824	-21.6%	75.3%	10.0%
Hernando	56	19,774	86.8%	5.7%	21.5%	17.8%	17.8%	23,304	-32.2%	51.6%	10.0%
Indian River	76	554,349	125.6%	5.7%	24.0%	72.8%	72.8%	957,650	-0.6%	122.3%	10.0%
Lee	67	1,346,551	259.0%	5.7%	32.4%	291.7%	80.0%	2,423,793	3.6%	131.6%	10.0%
Lee	79	112,008	149.8%	5.7%	25.5%	108.8%	80.0%	201,614	3.6%	131.6%	10.0%
Levy	57	46,468	152.7%	5.7%	25.7%	113.2%	80.0%	83,642	3.6%	131.6%	10.0%
Manatee	68	233,765	320.4%	5.7%	36.3%	412.1%	80.0%	420,778	3.6%	131.6%	10.0%
Monroe	85	4,184,058	220.4%	5.7%	30.0%	222.8%	80.0%	7,531,305	3.6%	131.6%	10.0%
Monroe	86	4,001,528	198.2%	5.7%	28.6%	185.4%	80.0%	7,202,750	3.6%	131.6%	10.0%
Nassau	69	31,273	57.8%	5.7%	19.7%	-20.9%	-20.0%	25,018	-54.0%	2.9%	2.9%
Okaloosa	70	217,123	160.3%	5.7%	26.2%	124.9%	80.0%	390,821	3.6%	131.6%	10.0%
Palm Beach	38	10,168,394	145.8%	5.7%	25.2%	102.6%	80.0%	18,303,110	3.6%	131.6%	10.0%
Palm Beach	87	2,026,519	179.9%	5.7%	27.4%	155.6%	80.0%	3,647,734	3.6%	131.6%	10.0%
Pasco	88	258,385	71.4%	5.7%	20.5%	-3.0%	-3.0%	250,736	-44.2%	24.9%	10.0%
Pinellas	42	1,151,421	251.4%	5.7%	31.9%	277.7%	80.0%	2,072,558	3.6%	131.6%	10.0%
Saint Johns	71	139,237	61.4%	5.7%	19.9%	-16.2%	-16.2%	116,740	-51.8%	7.9%	7.9%
Saint Lucie	77	61,732	169.3%	5.7%	26.7%	138.9%	80.0%	111,117	3.6%	131.6%	10.0%

CITIZENS PROPERTY INSURANCE CORPORATION

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
INDICATED TERRITORIAL RATE CHANGES

Off Balance Factor to keep 0% Change	0.575	Overall Selected Change	123.6%

Min Rate Change Before Off Balance	-20.0%
Max Rate Change Before Off Balance	80.0%

County	Territory Number	(1) 12/31/2008 Inforce Premium (at current rate level)	(2) Projected Total Loss & LAE Ratio	(3) Expected Fixed Expense Ratio	(4) Expected Variable Expense Ratio	(5) Indicated Rate Change Before Off Balancing	(6) Capped Indicated Rate Change Before Off Balancing	(7) Indicated Inforce Premium	(8) Selected Off-Balance Base Rate Change	(9) Proposed Total Rate Change	(10) Proposed Capped Rate Change
Santa Rosa	72	13,149	188.4%	5.7%	27.9%	169.4%	80.0%	23,668	3.6%	131.6%	10.0%
Santa Rosa	80	171,867	240.6%	5.7%	31.2%	258.2%	80.0%	309,360	3.6%	131.6%	10.0%
Sarasota	73	2,246,794	159.6%	5.7%	26.1%	123.7%	80.0%	4,044,230	3.6%	131.6%	10.0%
Sarasota	81	1,426,080	158.2%	5.7%	26.0%	121.7%	80.0%	2,566,944	3.6%	131.6%	10.0%
Volusia	44	1,405,450	60.4%	5.7%	19.8%	-17.6%	-17.6%	1,158,660	-52.6%	6.1%	6.1%
Volusia	74	1,034,789	101.3%	5.7%	22.4%	37.9%	37.9%	1,427,036	-20.7%	77.4%	10.0%
Wakulla	58	22,049	103.6%	5.7%	22.6%	41.3%	41.3%	31,145	-18.7%	81.7%	10.0%
Walton	75	1,045,818	76.0%	5.7%	20.8%	3.3%	3.3%	1,080,127	-40.6%	32.9%	10.0%
TOTAL		**62,535,201**	**159.5%**	**5.7%**	**26.1%**	**126.1%**	**73.8%**	**108,694,362**	**0.0%**	**123.6%**	**9.9%**

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
FOOTNOTES FOR EXHIBIT 2

Notes for Exhibit 2, Page 1:

(1) From Appendix A, Page 5, Column (5) of Statewide Rate Indication.
(2) From Exhibit 1, Page 2, Column (7)
(3) From statewide rate analysis [Exhibit "RIF Duplicate", Column (37)]
(4) From statewide rate analysis [Exhibit "RIF Duplicate", Column (37)]
(5) From statewide rate analysis [Exhibit "RIF Duplicate", Column (37)]
(6) From statewide rate analysis [Exhibit "RIF Duplicate", Column (37)]
*(7) = (2) * [Statewide Net Cost of Non-FHCF Reinsurance]*
*(8) = (2) * [Statewide Residual Market Contigency Provision]*
(9) = (4) + (5) + (7)
(10) = (3) + (6) + (8)

Notes for Exhibit 2, Page 2:

(1) From Appendix A, Page 5, Column (5) of Statewide Rate Indication.
(2) From Exhibit 1, Page 2, Column (6)
(3) From Exhibit 2, Page 1, Column (9)
(4) From Exhibit 2, Page 1, Column (10)
(5) = [(2) + (3)] / [1.0 - (4)] - 1.0
(6) = (5) capped at -20% and +80%
*(7) = [1.0 + (6)] * (1)*
*(8) = [1.0 + (6)] * [Off Balance Factor] - 1.0*
*(9) = [1.0 + (8)] * [1.0 + (Overall Statewide Rate Change)] - 1.0*
(10) Rate change capped at 10% and -10%.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CURRENT BASE RATES
RATE TABLE: CC-D

Territory		Building Base Rate Per $1,000				Contents Base Rate Per $1,000			
		Combined Hurricane and Other Wind				Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	3.132	2.871	1.782	1.260	2.871	2.871	1.782	1.155
60	Brevard	3.132	3.132	1.944	1.260	2.871	2.871	1.782	1.155
35	Broward	4.872	4.872	2.868	1.944	4.872	4.466	2.629	1.782
36	Broward	4.872	4.872	2.868	1.944	4.872	4.872	2.868	1.944
37	Broward	4.872	4.872	2.868	1.944	4.872	4.466	2.629	1.782
61	Charlotte	3.132	3.132	1.944	1.260	3.132	2.871	1.944	1.260
62	Collier	3.132	3.132	1.944	1.260	3.132	3.011	1.788	1.260
30	Dade	4.872	4.872	2.868	1.944	4.872	4.872	2.868	1.944
31	Dade	4.872	4.872	2.868	1.944	4.872	4.872	2.868	1.944
32	Dade	4.872	4.872	2.868	1.944	4.872	4.492	2.629	1.782
34	Dade	4.872	4.872	2.868	1.944	4.872	4.466	2.629	1.782
41	Duval	2.871	2.871	1.782	1.155	2.871	2.871	1.782	1.155
43	Escambia	2.160	2.160	1.260	0.924	1.980	1.980	1.155	0.847
63	Escambia	3.132	3.132	1.944	1.260	3.132	2.871	1.944	1.260
64	Flagler	2.871	2.871	1.782	1.155	2.871	2.871	1.782	1.155
78	Flagler	1.980	1.980	1.155	0.847	1.980	1.980	1.155	0.847
65	Franklin	3.132	3.132	1.944	1.260	3.132	2.871	1.944	1.260
66	Gulf	3.132	2.871	1.869	1.260	2.871	2.871	1.782	1.155
56	Hernando	2.871	2.871	1.782	1.155	2.871	2.871	1.782	1.155
76	Indian River	4.872	4.466	2.868	1.944	4.466	4.466	2.629	1.782
67	Lee	3.132	3.132	1.944	1.260	3.132	2.871	1.782	1.260
79	Lee	2.130	1.980	1.234	0.924	1.980	1.980	1.155	0.847
57	Levy	2.871	2.871	1.791	1.260	2.871	2.871	1.782	1.155
68	Manatee	3.132	3.132	1.944	1.260	3.132	2.950	1.944	1.260
85	Monroe	6.816	6.816	3.996	2.640	6.816	6.248	3.996	2.640
86	Monroe	5.844	5.844	3.432	2.280	5.844	5.844	3.432	2.280
69	Nassau	2.871	2.871	1.782	1.155	2.871	2.871	1.782	1.155
70	Okaloosa	3.132	3.132	1.944	1.260	2.927	2.871	1.782	1.259
38	Palm Beach	4.872	4.846	2.868	1.944	4.466	4.466	2.629	1.782
87	Palm Beach	4.872	4.872	2.868	1.944	4.872	4.474	2.868	1.944
88	Pasco	2.871	2.871	1.782	1.155	2.871	2.871	1.782	1.155
42	Pinellas	3.132	3.132	1.944	1.260	3.132	3.110	1.944	1.260
71	Saint Johns	2.871	2.871	1.782	1.155	2.871	2.871	1.782	1.155
77	Saint Lucie	4.872	4.744	2.868	1.944	4.466	4.466	2.629	1.782
72	Santa Rosa	3.132	3.132	1.944	1.260	3.132	2.871	1.944	1.260
80	Santa Rosa	2.160	2.160	1.260	0.924	2.160	1.980	1.260	0.924
73	Sarasota	3.132	2.953	1.944	1.260	2.871	2.871	1.782	1.155
81	Sarasota	2.160	2.160	1.260	0.924	1.980	1.980	1.155	0.847
44	Volusia	1.980	1.980	1.155	0.847	1.980	1.980	1.155	0.847
74	Volusia	2.871	2.871	1.782	1.213	2.871	2.871	1.782	1.155
58	Wakulla	2.871	2.871	1.782	1.155	2.871	2.871	1.782	1.155
75	Walton	3.132	3.132	1.944	1.260	2.969	2.871	1.782	1.155

Notes:
Source: See Citizens' current rate manual.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CURRENT BASE RATES
RATE TABLE: CC-E

Territory		Building Base Rate Per $1,000				Contents Base Rate Per $1,000			
		Combined Hurricane and Other Wind				Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	3.960	2.871	1.782	1.260	3.960	2.871	1.782	1.155
60	Brevard	4.272	3.132	1.944	1.260	3.960	2.871	1.782	1.155
35	Broward	7.248	6.276	5.357	4.928	6.644	5.753	5.357	4.928
36	Broward	7.248	6.276	5.844	5.376	7.248	5.871	5.357	4.928
37	Broward	7.248	5.986	5.357	4.928	6.644	5.753	5.357	4.928
61	Charlotte	4.320	3.132	1.944	1.260	4.230	2.872	1.944	1.260
62	Collier	4.320	3.132	1.944	1.260	4.320	3.020	1.794	1.260
30	Dade	7.248	6.276	5.844	5.044	7.248	5.753	5.357	4.928
31	Dade	7.248	6.276	5.823	5.012	7.248	5.753	5.357	4.928
32	Dade	7.248	6.276	5.357	4.928	7.052	5.753	5.357	4.928
34	Dade	7.248	6.006	5.357	4.928	6.644	5.753	5.357	4.928
41	Duval	3.960	2.871	1.782	1.155	3.960	2.871	1.782	1.155
43	Escambia	2.905	2.160	1.260	0.924	2.871	1.980	1.155	0.847
63	Escambia	4.320	3.132	1.944	1.260	4.083	2.871	1.944	1.260
64	Flagler	3.960	2.871	1.782	1.155	3.960	2.871	1.782	1.155
78	Flagler	2.871	1.980	1.155	0.847	2.871	1.980	1.155	0.847
65	Franklin	4.320	3.132	1.944	1.260	3.960	2.871	1.944	1.260
66	Gulf	3.960	2.871	1.872	1.260	3.960	2.871	1.782	1.155
56	Hernando	3.960	2.871	1.782	1.155	3.960	2.871	1.782	1.155
76	Indian River	6.644	5.753	5.357	4.928	6.644	5.753	5.357	4.928
67	Lee	4.320	3.132	1.944	1.260	3.960	2.871	1.782	1.260
79	Lee	2.871	1.980	1.236	0.924	2.871	1.980	1.155	0.847
57	Levy	3.960	2.871	1.795	1.260	3.960	2.871	1.782	1.155
68	Manatee	4.320	3.132	1.944	1.260	4.317	2.959	1.944	1.260
85	Monroe	10.164	8.280	7.447	5.764	9.317	8.030	7.447	5.764
86	Monroe	7.248	5.844	4.800	3.996	7.248	5.844	4.400	3.663
69	Nassau	3.960	2.871	1.782	1.155	3.960	2.871	1.782	1.155
70	Okaloosa	4.320	3.132	1.944	1.260	3.960	2.871	1.782	1.260
38	Palm Beach	6.644	5.753	5.357	4.928	6.644	5.753	5.357	4.928
87	Palm Beach	7.248	6.276	5.808	4.928	6.666	5.753	5.357	4.928
88	Pasco	3.960	2.871	1.782	1.155	3.960	2.871	1.782	1.155
42	Pinellas	4.320	3.132	1.944	1.260	4.320	3.120	1.944	1.260
71	Saint Johns	3.960	2.871	1.782	1.155	3.960	2.871	1.782	1.155
77	Saint Lucie	6.644	5.753	5.357	4.928	6.644	5.753	5.357	4.928
72	Santa Rosa	4.320	3.132	1.944	1.260	4.200	2.871	1.944	1.260
80	Santa Rosa	3.132	2.160	1.260	0.924	2.871	1.980	1.260	0.924
73	Sarasota	3.974	2.958	1.944	1.260	3.960	2.871	1.782	1.155
81	Sarasota	3.132	2.160	1.260	0.924	2.871	1.980	1.155	0.847
44	Volusia	2.871	1.980	1.155	0.847	2.871	1.980	1.155	0.847
74	Volusia	3.960	2.871	1.782	1.215	3.960	2.871	1.782	1.155
58	Wakulla	3.960	2.871	1.782	1.155	3.960	2.871	1.782	1.155
75	Walton	4.320	3.132	1.944	1.260	3.960	2.871	1.782	1.155

Notes:
Source: See Citizens' current rate manual.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CURRENT BASE RATES
RATE TABLE: CC-F

Territory		Building Base Rate Per $1,000				Contents Base Rate Per $1,000			
		Combined Hurricane and Other Wind				Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
60	Brevard	4.246	3.135	2.064	1.332	4.246	3.135	1.892	1.221
35	Broward	7.056	5.184	3.156	2.064	6.468	4.752	2.893	1.892
36	Broward	7.056	5.184	3.156	2.064	6.468	4.752	2.893	2.064
37	Broward	6.676	4.970	3.156	2.064	6.468	4.752	2.893	1.892
61	Charlotte	4.632	3.420	2.064	1.332	4.246	3.135	1.892	1.290
62	Collier	4.632	3.420	2.064	1.332	4.246	3.135	1.892	1.221
30	Dade	7.056	5.184	3.156	2.064	6.468	4.752	2.893	1.892
31	Dade	7.056	5.184	3.156	2.064	6.468	4.752	2.893	1.892
32	Dade	7.056	5.184	3.156	2.064	6.468	4.752	2.893	1.892
34	Dade	6.678	4.986	3.144	2.064	6.468	4.752	2.893	1.892
41	Duval	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
43	Escambia	3.135	2.123	1.332	0.972	3.135	2.123	1.221	0.891
63	Escambia	4.632	3.420	2.064	1.332	4.246	3.135	1.892	1.221
64	Flagler	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
78	Flagler	3.135	2.123	1.221	0.891	3.135	2.123	1.221	0.891
65	Franklin	4.350	3.296	2.064	1.332	4.246	3.135	1.892	1.273
66	Gulf	4.246	3.135	1.892	1.298	4.246	3.135	1.892	1.221
56	Hernando	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
76	Indian River	6.468	4.752	2.893	2.064	6.468	4.752	2.893	1.892
67	Lee	4.632	3.420	2.064	1.332	4.246	3.135	1.892	1.221
79	Lee	3.135	2.123	1.221	0.891	3.135	2.123	1.221	0.891
57	Levy	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
68	Manatee	4.632	3.420	2.064	1.332	4.246	3.135	1.892	1.332
85	Monroe	9.172	6.875	4.488	3.036	8.998	6.578	4.114	2.783
86	Monroe	7.716	6.168	3.888	2.544	7.073	5.654	3.564	2.332
69	Nassau	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
70	Okaloosa	4.246	3.135	2.064	1.332	4.246	3.135	1.892	1.221
38	Palm Beach	6.468	4.752	2.893	2.064	6.468	4.752	2.893	1.892
87	Palm Beach	7.056	5.184	3.156	2.064	6.468	4.752	2.893	1.892
88	Pasco	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
42	Pinellas	4.632	3.420	2.064	1.332	4.246	3.135	1.892	1.332
71	Saint Johns	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
77	Saint Lucie	6.468	4.752	3.156	2.064	6.468	4.752	2.893	1.892
72	Santa Rosa	4.632	3.420	2.064	1.332	4.246	3.135	1.892	1.269
80	Santa Rosa	3.420	2.316	1.332	0.972	3.135	2.123	1.221	0.891
73	Sarasota	4.246	3.135	1.892	1.332	4.246	3.135	1.892	1.221
81	Sarasota	3.135	2.288	1.332	0.972	3.135	2.123	1.221	0.891
44	Volusia	3.135	2.123	1.221	0.891	3.135	2.123	1.221	0.891
74	Volusia	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
58	Wakulla	4.246	3.135	1.892	1.221	4.246	3.135	1.892	1.221
75	Walton	4.246	3.135	1.892	1.332	4.246	3.135	1.892	1.221

Notes:
Source: See Citizens' current rate manual.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CURRENT BASE RATES
RATE TABLE: CC-G

Territory		Building Base Rate Per $1,000				Contents Base Rate Per $1,000			
		Combined Hurricane and Other Wind				Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	1.896	1.896	1.738	1.540	1.260	1.155	1.155	1.045
60	Brevard	1.896	1.896	1.896	1.680	1.260	1.260	1.155	1.045
35	Broward	2.856	2.856	2.868	2.472	1.896	1.896	1.738	1.518
36	Broward	2.856	2.856	2.868	2.472	1.896	1.896	1.896	1.656
37	Broward	2.856	2.856	2.868	2.472	1.896	1.896	1.738	1.518
61	Charlotte	1.896	1.896	1.896	1.680	1.260	1.260	1.260	1.140
62	Collier	1.896	1.896	1.896	1.680	1.260	1.260	1.260	1.140
30	Dade	2.856	2.856	2.868	2.472	1.896	1.896	1.896	1.656
31	Dade	2.856	2.856	2.868	2.472	1.896	1.896	1.896	1.656
32	Dade	2.856	2.856	2.868	2.472	1.896	1.896	1.743	1.518
34	Dade	2.856	2.856	2.868	2.472	1.896	1.896	1.738	1.518
41	Duval	1.738	1.738	1.738	1.540	1.155	1.155	1.155	1.045
43	Escambia	1.260	1.260	1.260	1.140	0.852	0.852	0.759	0.693
63	Escambia	1.896	1.896	1.896	1.680	1.260	1.260	1.260	1.140
64	Flagler	1.896	1.738	1.738	1.540	1.155	1.155	1.155	1.045
78	Flagler	1.260	1.259	1.155	1.045	0.852	0.781	0.759	0.693
65	Franklin	1.896	1.896	1.896	1.680	1.260	1.260	1.260	1.140
66	Gulf	1.896	1.896	1.738	1.540	1.260	1.260	1.155	1.045
56	Hernando	1.896	1.738	1.738	1.540	1.155	1.155	1.155	1.045
76	Indian River	2.856	2.856	2.838	2.317	1.896	1.896	1.738	1.518
67	Lee	1.896	1.896	1.896	1.680	1.260	1.260	1.260	1.140
79	Lee	1.260	1.260	1.155	1.045	0.852	0.781	0.759	0.693
57	Levy	1.896	1.841	1.738	1.540	1.260	1.155	1.155	1.045
68	Manatee	1.896	1.896	1.896	1.680	1.260	1.260	1.260	1.140
85	Monroe	3.996	3.996	3.996	3.468	2.676	2.676	2.676	2.292
86	Monroe	3.576	3.576	3.576	3.084	2.388	2.388	2.388	2.052
69	Nassau	1.738	1.738	1.738	1.540	1.155	1.155	1.155	1.045
70	Okaloosa	1.896	1.896	1.896	1.680	1.260	1.260	1.260	1.126
38	Palm Beach	2.856	2.856	2.868	2.472	1.896	1.896	1.738	1.518
87	Palm Beach	2.856	2.856	2.868	2.472	1.896	1.896	1.896	1.656
88	Pasco	1.896	1.738	1.738	1.540	1.155	1.155	1.155	1.045
42	Pinellas	1.896	1.896	1.896	1.680	1.260	1.260	1.260	1.140
71	Saint Johns	1.738	1.738	1.738	1.540	1.155	1.155	1.155	1.045
77	Saint Lucie	2.856	2.856	2.868	2.472	1.896	1.896	1.874	1.518
72	Santa Rosa	1.896	1.896	1.896	1.680	1.260	1.260	1.260	1.140
80	Santa Rosa	1.260	1.260	1.260	1.140	0.852	0.852	0.828	0.756
73	Sarasota	1.896	1.896	1.896	1.668	1.260	1.260	1.155	1.045
81	Sarasota	1.260	1.260	1.260	1.140	0.852	0.852	0.769	0.693
44	Volusia	1.260	1.155	1.155	1.045	0.794	0.781	0.759	0.693
74	Volusia	1.896	1.740	1.738	1.540	1.260	1.155	1.155	1.045
58	Wakulla	1.896	1.738	1.738	1.540	1.175	1.155	1.155	1.045
75	Walton	1.896	1.896	1.896	1.655	1.260	1.260	1.155	1.045

Notes:
Source: See Citizens' current rate manual.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
CURRENT BASE RATES
RATE TABLE: CC-H

Territory		Building Base Rate Per $1,000	Contents Base Rate Per $1,000
Number	**Description**	**Combined Hurricane and Other Wind**	**Combined Hurricane and Other Wind**
59	Bay	7.715	7.715
60	Brevard	8.358	7.715
35	Broward	11.933	10.938
36	Broward	11.933	11.933
37	Broward	11.933	10.938
61	Charlotte	8.417	7.715
62	Collier	8.417	7.715
30	Dade	10.958	10.958
31	Dade	10.958	10.958
32	Dade	11.933	10.938
34	Dade	11.933	10.938
41	Duval	7.715	7.715
43	Escambia	5.167	4.737
63	Escambia	8.417	7.715
64	Flagler	7.715	7.715
78	Flagler	4.737	4.737
65	Franklin	8.417	7.715
66	Gulf	7.715	7.715
56	Hernando	7.715	7.715
76	Indian River	10.958	10.045
67	Lee	8.417	7.715
79	Lee	5.167	4.737
57	Levy	7.715	7.715
68	Manatee	8.417	7.715
85	Monroe	14.971	13.724
86	Monroe	14.971	13.724
69	Nassau	7.715	7.715
70	Okaloosa	8.417	7.715
38	Palm Beach	11.933	10.938
87	Palm Beach	11.933	10.938
88	Pasco	7.715	7.715
42	Pinellas	8.074	7.401
71	Saint Johns	7.715	7.715
77	Saint Lucie	11.933	10.938
72	Santa Rosa	8.417	7.715
80	Santa Rosa	5.167	4.737
73	Sarasota	8.143	7.715
81	Sarasota	5.167	4.737
44	Volusia	4.737	4.737
74	Volusia	7.085	7.085
58	Wakulla	7.715	7.715
75	Walton	8.417	7.715

Notes:
Source: See Citizens' current rate manual.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
PROPOSED BASE RATES
RATE TABLE: CC-D

Territory		Building Base Rate Per $1,000				Contents Base Rate Per $1,000			
		Combined Hurricane and Other Wind				Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	3.445	3.158	1.960	1.386	3.158	3.158	1.960	1.270
60	Brevard	3.445	3.445	2.138	1.386	3.158	3.158	1.960	1.270
35	Broward	5.359	5.359	3.154	2.138	5.359	4.912	2.891	1.960
36	Broward	5.359	5.359	3.154	2.138	5.359	5.359	3.154	2.138
37	Broward	5.359	5.359	3.154	2.138	5.359	4.912	2.891	1.960
61	Charlotte	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
62	Collier	3.445	3.445	2.138	1.386	3.445	3.312	1.966	1.386
30	Dade	5.359	5.359	3.154	2.138	5.359	5.359	3.154	2.138
31	Dade	5.359	5.359	3.154	2.138	5.359	5.359	3.154	2.138
32	Dade	5.359	5.359	3.154	2.138	5.359	4.941	2.891	1.960
34	Dade	5.359	5.359	3.154	2.138	5.359	4.912	2.891	1.960
41	Duval	2.955	2.955	1.834	1.189	2.955	2.955	1.834	1.189
43	Escambia	2.376	2.376	1.386	1.016	2.178	2.178	1.270	0.931
63	Escambia	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
64	Flagler	2.955	2.955	1.834	1.189	2.955	2.955	1.834	1.189
78	Flagler	2.178	2.178	1.270	0.931	2.178	2.178	1.270	0.931
65	Franklin	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
66	Gulf	3.445	3.158	2.055	1.386	3.158	3.158	1.960	1.270
56	Hernando	3.158	3.158	1.960	1.270	3.158	3.158	1.960	1.270
76	Indian River	5.359	4.912	3.154	2.138	4.912	4.912	2.891	1.960
67	Lee	3.445	3.445	2.138	1.386	3.445	3.158	1.960	1.386
79	Lee	2.343	2.178	1.357	1.016	2.178	2.178	1.270	0.931
57	Levy	3.158	3.158	1.970	1.386	3.158	3.158	1.960	1.270
68	Manatee	3.445	3.445	2.138	1.386	3.445	3.245	2.138	1.386
85	Monroe	7.497	7.497	4.395	2.904	7.497	6.872	4.395	2.904
86	Monroe	6.428	6.428	3.775	2.508	6.428	6.428	3.775	2.508
69	Nassau	2.955	2.955	1.834	1.189	2.955	2.955	1.834	1.189
70	Okaloosa	3.445	3.445	2.138	1.386	3.219	3.158	1.960	1.384
38	Palm Beach	5.359	5.330	3.154	2.138	4.912	4.912	2.891	1.960
87	Palm Beach	5.359	5.359	3.154	2.138	5.359	4.921	3.154	2.138
88	Pasco	3.158	3.158	1.960	1.270	3.158	3.158	1.960	1.270
42	Pinellas	3.445	3.445	2.138	1.386	3.445	3.421	2.138	1.386
71	Saint Johns	3.097	3.097	1.922	1.246	3.097	3.097	1.922	1.246
77	Saint Lucie	5.359	5.218	3.154	2.138	4.912	4.912	2.891	1.960
72	Santa Rosa	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
80	Santa Rosa	2.376	2.376	1.386	1.016	2.376	2.178	1.386	1.016
73	Sarasota	3.445	3.248	2.138	1.386	3.158	3.158	1.960	1.270
81	Sarasota	2.376	2.376	1.386	1.016	2.178	2.178	1.270	0.931
44	Volusia	2.100	2.100	1.225	0.898	2.100	2.100	1.225	0.898
74	Volusia	3.158	3.158	1.960	1.334	3.158	3.158	1.960	1.270
58	Wakulla	3.158	3.158	1.960	1.270	3.158	3.158	1.960	1.270
75	Walton	3.445	3.445	2.138	1.386	3.265	3.158	1.960	1.270

Notes:
See explanatory memorandum for details.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
PROPOSED BASE RATES
RATE TABLE: CC-E

Territory		Building Base Rate Per $1,000 Combined Hurricane and Other Wind				Contents Base Rate Per $1,000 Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	4.356	3.158	1.960	1.386	4.356	3.158	1.960	1.270
60	Brevard	4.699	3.445	2.138	1.386	4.356	3.158	1.960	1.270
35	Broward	7.972	6.903	5.892	5.420	7.308	6.328	5.892	5.420
36	Broward	7.972	6.903	6.428	5.913	7.972	6.458	5.892	5.420
37	Broward	7.972	6.584	5.892	5.420	7.308	6.328	5.892	5.420
61	Charlotte	4.752	3.445	2.138	1.386	4.653	3.159	2.138	1.386
62	Collier	4.752	3.445	2.138	1.386	4.752	3.322	1.973	1.386
30	Dade	7.972	6.903	6.428	5.548	7.972	6.328	5.892	5.420
31	Dade	7.972	6.903	6.405	5.513	7.972	6.328	5.892	5.420
32	Dade	7.972	6.903	5.892	5.420	7.757	6.328	5.892	5.420
34	Dade	7.972	6.606	5.892	5.420	7.308	6.328	5.892	5.420
41	Duval	4.076	2.955	1.834	1.189	4.076	2.955	1.834	1.189
43	Escambia	3.195	2.376	1.386	1.016	3.158	2.178	1.270	0.931
63	Escambia	4.752	3.445	2.138	1.386	4.491	3.158	2.138	1.386
64	Flagler	4.076	2.955	1.834	1.189	4.076	2.955	1.834	1.189
78	Flagler	3.158	2.178	1.270	0.931	3.158	2.178	1.270	0.931
65	Franklin	4.752	3.445	2.138	1.386	4.356	3.158	2.138	1.386
66	Gulf	4.356	3.158	2.059	1.386	4.356	3.158	1.960	1.270
56	Hernando	4.356	3.158	1.960	1.270	4.356	3.158	1.960	1.270
76	Indian River	7.308	6.328	5.892	5.420	7.308	6.328	5.892	5.420
67	Lee	4.752	3.445	2.138	1.386	4.356	3.158	1.960	1.386
79	Lee	3.158	2.178	1.359	1.016	3.158	2.178	1.270	0.931
57	Levy	4.356	3.158	1.974	1.386	4.356	3.158	1.960	1.270
68	Manatee	4.752	3.445	2.138	1.386	4.748	3.254	2.138	1.386
85	Monroe	11.180	9.108	8.191	6.340	10.248	8.833	8.191	6.340
86	Monroe	7.972	6.428	5.280	4.395	7.972	6.428	4.840	4.029
69	Nassau	4.076	2.955	1.834	1.189	4.076	2.955	1.834	1.189
70	Okaloosa	4.752	3.445	2.138	1.386	4.356	3.158	1.960	1.386
38	Palm Beach	7.308	6.328	5.892	5.420	7.308	6.328	5.892	5.420
87	Palm Beach	7.972	6.903	6.388	5.420	7.332	6.328	5.892	5.420
88	Pasco	4.356	3.158	1.960	1.270	4.356	3.158	1.960	1.270
42	Pinellas	4.752	3.445	2.138	1.386	4.752	3.432	2.138	1.386
71	Saint Johns	4.272	3.097	1.922	1.246	4.272	3.097	1.922	1.246
77	Saint Lucie	7.308	6.328	5.892	5.420	7.308	6.328	5.892	5.420
72	Santa Rosa	4.752	3.445	2.138	1.386	4.620	3.158	2.138	1.386
80	Santa Rosa	3.445	2.376	1.386	1.016	3.158	2.178	1.386	1.016
73	Sarasota	4.371	3.253	2.138	1.386	4.356	3.158	1.960	1.270
81	Sarasota	3.445	2.376	1.386	1.016	3.158	2.178	1.270	0.931
44	Volusia	3.045	2.100	1.225	0.898	3.045	2.100	1.225	0.898
74	Volusia	4.356	3.158	1.960	1.336	4.356	3.158	1.960	1.270
58	Wakulla	4.356	3.158	1.960	1.270	4.356	3.158	1.960	1.270
75	Walton	4.752	3.445	2.138	1.386	4.356	3.158	1.960	1.270

Notes:
See explanatory memorandum for details.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
PROPOSED BASE RATES
RATE TABLE: CC-F

Territory		Building Base Rate Per $1,000 Combined Hurricane and Other Wind				Contents Base Rate Per $1,000 Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
60	Brevard	4.670	3.448	2.270	1.465	4.670	3.448	2.081	1.343
35	Broward	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
36	Broward	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.270
37	Broward	7.343	5.467	3.471	2.270	7.114	5.227	3.182	2.081
61	Charlotte	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.419
62	Collier	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.343
30	Dade	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
31	Dade	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
32	Dade	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
34	Dade	7.345	5.484	3.458	2.270	7.114	5.227	3.182	2.081
41	Duval	4.370	3.227	1.947	1.257	4.370	3.227	1.947	1.257
43	Escambia	3.448	2.335	1.465	1.069	3.448	2.335	1.343	0.980
63	Escambia	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.343
64	Flagler	4.370	3.227	1.947	1.257	4.370	3.227	1.947	1.257
78	Flagler	3.448	2.335	1.343	0.980	3.448	2.335	1.343	0.980
65	Franklin	4.785	3.625	2.270	1.465	4.670	3.448	2.081	1.400
66	Gulf	4.670	3.448	2.081	1.427	4.670	3.448	2.081	1.343
56	Hernando	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
76	Indian River	7.114	5.227	3.182	2.270	7.114	5.227	3.182	2.081
67	Lee	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.343
79	Lee	3.448	2.335	1.343	0.980	3.448	2.335	1.343	0.980
57	Levy	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
68	Manatee	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.465
85	Monroe	10.089	7.562	4.936	3.339	9.897	7.235	4.525	3.061
86	Monroe	8.487	6.784	4.276	2.798	7.780	6.219	3.920	2.565
69	Nassau	4.370	3.227	1.947	1.257	4.370	3.227	1.947	1.257
70	Okaloosa	4.670	3.448	2.270	1.465	4.670	3.448	2.081	1.343
38	Palm Beach	7.114	5.227	3.182	2.270	7.114	5.227	3.182	2.081
87	Palm Beach	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
88	Pasco	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
42	Pinellas	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.465
71	Saint Johns	4.580	3.382	2.041	1.317	4.580	3.382	2.041	1.317
77	Saint Lucie	7.114	5.227	3.471	2.270	7.114	5.227	3.182	2.081
72	Santa Rosa	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.395
80	Santa Rosa	3.762	2.547	1.465	1.069	3.448	2.335	1.343	0.980
73	Sarasota	4.670	3.448	2.081	1.465	4.670	3.448	2.081	1.343
81	Sarasota	3.448	2.516	1.465	1.069	3.448	2.335	1.343	0.980
44	Volusia	3.325	2.252	1.295	0.945	3.325	2.252	1.295	0.945
74	Volusia	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
58	Wakulla	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
75	Walton	4.670	3.448	2.081	1.465	4.670	3.448	2.081	1.343

Notes:
See explanatory memorandum for details.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
PROPOSED BASE RATES
RATE TABLE: CC-G

Territory		Building Base Rate Per $1,000				Contents Base Rate Per $1,000			
		Combined Hurricane and Other Wind				Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	2.085	2.085	1.911	1.694	1.386	1.270	1.270	1.149
60	Brevard	2.085	2.085	2.085	1.848	1.386	1.386	1.270	1.149
35	Broward	3.141	3.141	3.154	2.719	2.085	2.085	1.911	1.669
36	Broward	3.141	3.141	3.154	2.719	2.085	2.085	2.085	1.821
37	Broward	3.141	3.141	3.154	2.719	2.085	2.085	1.911	1.669
61	Charlotte	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
62	Collier	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
30	Dade	3.141	3.141	3.154	2.719	2.085	2.085	2.085	1.821
31	Dade	3.141	3.141	3.154	2.719	2.085	2.085	2.085	1.821
32	Dade	3.141	3.141	3.154	2.719	2.085	2.085	1.917	1.669
34	Dade	3.141	3.141	3.154	2.719	2.085	2.085	1.911	1.669
41	Duval	1.789	1.789	1.789	1.585	1.189	1.189	1.189	1.076
43	Escambia	1.386	1.386	1.386	1.254	0.937	0.937	0.834	0.762
63	Escambia	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
64	Flagler	1.952	1.789	1.789	1.585	1.189	1.189	1.189	1.076
78	Flagler	1.386	1.384	1.270	1.149	0.937	0.859	0.834	0.762
65	Franklin	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
66	Gulf	2.085	2.085	1.911	1.694	1.386	1.386	1.270	1.149
56	Hernando	2.085	1.911	1.911	1.694	1.270	1.270	1.270	1.149
76	Indian River	3.141	3.141	3.121	2.548	2.085	2.085	1.911	1.669
67	Lee	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
79	Lee	1.386	1.386	1.270	1.149	0.937	0.859	0.834	0.762
57	Levy	2.085	2.025	1.911	1.694	1.386	1.270	1.270	1.149
68	Manatee	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
85	Monroe	4.395	4.395	4.395	3.814	2.943	2.943	2.943	2.521
86	Monroe	3.933	3.933	3.933	3.392	2.626	2.626	2.626	2.257
69	Nassau	1.789	1.789	1.789	1.585	1.189	1.189	1.189	1.076
70	Okaloosa	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.238
38	Palm Beach	3.141	3.141	3.154	2.719	2.085	2.085	1.911	1.669
87	Palm Beach	3.141	3.141	3.154	2.719	2.085	2.085	2.085	1.821
88	Pasco	2.085	1.911	1.911	1.694	1.270	1.270	1.270	1.149
42	Pinellas	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
71	Saint Johns	1.875	1.875	1.875	1.661	1.246	1.246	1.246	1.127
77	Saint Lucie	3.141	3.141	3.154	2.719	2.085	2.085	2.061	1.669
72	Santa Rosa	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
80	Santa Rosa	1.386	1.386	1.386	1.254	0.937	0.937	0.910	0.831
73	Sarasota	2.085	2.085	2.085	1.834	1.386	1.386	1.270	1.149
81	Sarasota	1.386	1.386	1.386	1.254	0.937	0.937	0.845	0.762
44	Volusia	1.337	1.225	1.225	1.108	0.842	0.828	0.805	0.735
74	Volusia	2.085	1.914	1.911	1.694	1.386	1.270	1.270	1.149
58	Wakulla	2.085	1.911	1.911	1.694	1.292	1.270	1.270	1.149
75	Walton	2.085	2.085	2.085	1.820	1.386	1.386	1.270	1.149

Notes:
See explanatory memorandum for details.

WIND ONLY -- COMMERCIAL NON-RESIDENTIAL
PROPOSED BASE RATES
RATE TABLE: CC-H

Territory		Building Base Rate Per $1,000	Contents Base Rate Per $1,000
Number	Description	Combined Hurricane and Other Wind	Combined Hurricane and Other Wind
59	Bay	8.486	8.486
60	Brevard	9.193	8.486
35	Broward	13.126	12.031
36	Broward	13.126	13.126
37	Broward	13.126	12.031
61	Charlotte	9.258	8.486
62	Collier	9.258	8.486
30	Dade	12.053	12.053
31	Dade	12.053	12.053
32	Dade	13.126	12.031
34	Dade	13.126	12.031
41	Duval	7.941	7.941
43	Escambia	5.683	5.210
63	Escambia	9.258	8.486
64	Flagler	7.941	7.941
78	Flagler	5.210	5.210
65	Franklin	9.258	8.486
66	Gulf	8.486	8.486
56	Hernando	8.486	8.486
76	Indian River	12.053	11.049
67	Lee	9.258	8.486
79	Lee	5.683	5.210
57	Levy	8.486	8.486
68	Manatee	9.258	8.486
85	Monroe	16.468	15.096
86	Monroe	16.468	15.096
69	Nassau	7.941	7.941
70	Okaloosa	9.258	8.486
38	Palm Beach	13.126	12.031
87	Palm Beach	13.126	12.031
88	Pasco	8.486	8.486
42	Pinellas	8.881	8.141
71	Saint Johns	8.323	8.323
77	Saint Lucie	13.126	12.031
72	Santa Rosa	9.258	8.486
80	Santa Rosa	5.683	5.210
73	Sarasota	8.957	8.486
81	Sarasota	5.683	5.210
44	Volusia	5.025	5.025
74	Volusia	7.793	7.793
58	Wakulla	8.486	8.486
75	Walton	9.258	8.486

Notes:
See explanatory memorandum for details.

Citizens Property Insurance Corporation
Agent Commission Schedule

Line of Business	Stated[1] Commission Percentage	Effective[2] Commission Percentage	Current Non-Commissionable Surcharges, Assessments, & Fees as of 6/1/09	
Personal Residential Multiperil (PR-M)	**10%**	**7.7% - With Wind[3]** **9.5% - Ex-Wind**	• Citizens Policyholder Surcharge • Citizens Emergency Assessment • EMPA • FHCF Emergency Assessment	• Florida Insurance Guaranty Association Surcharge • Tax-Exempt Surcharge • CAT Protection Surcharge[4]
Personal Residential Wind-Only (PR-W)	**10%**	**8.3%**	• Citizens Policyholder Surcharge • Citizens Emergency Assessment • FHCF Emergency Assessment • Catastrophe Financing/Reinsurance Surcharge	• Florida Insurance Guaranty Association Surcharge • Tax-Exempt Surcharge
Commercial Residential Multiperil (CR-M)	**12%**	**11.4%**	• Citizens Policyholder Surcharge • Citizens Emergency Assessment • EMPA • FHCF Emergency Assessment	• Fire College Trust Fund • Florida Insurance Guaranty Association Surcharge • Tax-Exempt Surcharge
Commercial Residential Wind-Only (CR-W)	**14%**	**11.7%**	• Citizens Policyholder Surcharge • Citizens Emergency Assessment • FHCF Emergency Assessment • Catastrophe Financing/Reinsurance Surcharge	• Florida Insurance Guaranty Association Surcharge • Tax-Exempt Surcharge
Commercial Nonresidential Wind-Only (CNR-W)	**14%**	**11.7%**	• Citizens Policyholder Surcharge • Citizens Emergency Assessment • FHCF Emergency Assessment • Catastrophe Financing/Reinsurance Surcharge	• Florida Insurance Guaranty Association Surcharge • Tax-Exempt Surcharge
Commercial Nonresidential Multiperil (CNR-M)	**7%**	**6.7%** **(Excludes inspection fee)**	• Citizens Policyholder Surcharge • Citizens Emergency Assessment • EMPA • FHCF Emergency Assessment	• Fire College Trust Fund • Tax-Exempt Surcharge • Inspection Fee

[1] **Stated Commission Percentage** is the percentage Citizens applies to commissionable premium to calculate the commission that will be paid. The definition of commissionable premium can be found in the Underwriting Manuals. Total policy premiums include additional surcharges and assessments that are non-commissionable. To view a list of these, please refer to the Citizens Policy Surcharges document on the Agent Resources website.

[2] **Effective Commission Percentage** can be used to estimate the commission that will be paid. This is done by multiplying the total annual premium by the applicable Effective Commission Percentage shown above. It can also be determined by dividing the actual commission paid by the total annual premium charged to the policyholder. These percentages can change when non-commissionable charges are added, removed, or amended.

[3] The Effective Commission Percentage for PR-M policies with wind coverage is a statewide average. Actual effective commission percentages for policies that include wind coverage vary by territory as shown in the PR-M Effective Commission Rates By Territory exhibit. The effective commission percentage for policies excluding wind does not vary by territory and is not subject to the CAT Protection Surcharge.

[4] PR-M policies with wind coverage include a non-commissionable CAT Protection Surcharge. The Agent's Information section of the PR-M Rating Worksheets shows the application of the CAT Protection Surcharge in determining commissionable premium.

RiskLink Version 6.0b - Florida Ratemaking Model
Historical (Long-Term), Including Demand Surge, Excluding Storm Surge
Includes (CC-CNR wind policies only)

Critical Prob.	Return Period	HRA-CNRW123108 (USD) Gross Loss AEP	HRA-CRNW123108 (USD) Gross Loss OEP	HRA-CNRW123108 (USD) Gross Loss TCE-AEP
0.01%	10,000	5,417,454,098	5,270,475,784	6,110,850,431
0.02%	5,000	4,882,661,647	4,756,183,103	5,614,866,378
0.10%	1,000	3,437,396,911	3,330,056,816	4,325,182,036
0.20%	500	2,737,221,620	2,637,457,223	3,686,515,402
0.40%	250	2,047,135,129	1,953,676,710	3,018,163,943
1.00%	100	1,250,277,028	1,162,958,379	2,148,940,436
1.05%	95	1,213,569,949	1,127,182,341	2,103,111,473
1.11%	90	1,176,010,206	1,090,729,197	2,055,284,373
1.18%	85	1,137,357,663	1,053,523,982	2,005,295,754
1.25%	80	1,097,803,493	1,015,569,980	1,953,084,511
1.33%	75	1,057,139,108	976,705,677	1,898,323,619
1.43%	70	1,015,292,497	936,760,364	1,840,845,234
1.54%	65	972,037,789	895,616,928	1,780,271,850
1.67%	60	927,176,227	852,927,758	1,716,369,736
1.82%	55	880,300,625	808,560,501	1,648,571,919
2.00%	50	831,152,631	762,125,098	1,576,479,646
2.22%	45	779,245,329	713,080,920	1,499,287,099
2.50%	40	723,922,436	661,137,547	1,416,154,431
2.86%	35	664,393,746	605,819,963	1,325,761,558
3.33%	30	599,846,354	545,336,573	1,226,492,006
4.00%	25	527,873,492	478,201,457	1,115,832,824
5.00%	20	446,363,213	403,098,070	989,632,248
6.67%	15	352,086,017	317,072,562	841,238,981
10.00%	10	238,541,652	214,959,377	657,393,871
20.00%	5	90,086,646	81,921,729	404,352,398

	Pure Premium (AAL)	88,793,054
	Standard Deviation	276,765,831
	Coefficient of Variation	3.12

HRA-CNRW123108 (USD) Gross Loss TCE-OEP
5,929,527,762
5,458,882,766
4,203,040,699
3,574,035,386
2,913,731,475
2,052,679,376
2,007,278,487
1,959,964,916
1,910,608,132
1,859,079,328
1,805,114,965
1,748,492,091
1,689,064,478
1,626,353,775
1,560,051,100
1,489,556,819
1,414,303,549
1,333,462,364
1,245,817,511
1,149,910,272
1,043,318,563
922,384,711
781,062,481
607,636,467
372,252,154

AVERAGE ANNUAL LOSS BY TERRITORY, BY CONSTRUCTION
RMS, RISKLINK v6.0b
COMMERCIAL NON RESIDENTIAL CAT EXPOSURE AS OF 12/31/08

	HRA-CNR	
TERRITORY	CONSTRUCTION	GROSS AAL
30	FRM	27,499
30	MAS	3,688,745
30	SWR	852,930
30	WR	1,151,447
31	FRM	33,699
31	MAS	782,382
31	SWR	199,769
31	WR	715,435
32	UNKNOWN	262
32	FRM	27,455
32	MAS	2,393,249
32	SWR	1,072,249
32	WR	1,754,730
34	UNKNOWN	179
34	FRM	64,287
34	MAS	2,620,687
34	SWR	1,486,505
34	WR	1,411,360
35	FRM	129,719
35	MAS	3,475,673
35	SWR	2,161,408
35	WR	1,121,234
36	FRM	7,553
36	MAS	1,939,633
36	SWR	440,890
36	WR	637,302
37	UNKNOWN	294
37	FRM	103,199
37	MAS	2,866,807
37	SWR	2,230,250
37	WR	1,264,982
38	UNKNOWN	56
38	FRM	440,586
38	MAS	6,475,934
38	SWR	3,957,483
38	WR	2,305,468
41	FRM	9,048
41	MAS	39,909
41	SWR	9,909
41	WR	1,657
42	FRM	247,757
42	MAS	1,761,560
42	SWR	275,368
42	WR	302,005
43	UNKNOWN	179
43	FRM	867,915
43	MAS	1,497,748
43	SWR	335,598
43	WR	104,568
44	UNKNOWN	17

44	FRM	74,862
44	MAS	456,539
44	SWR	142,736
44	WR	67,134
56	FRM	2,610
56	MAS	12,521
57	FRM	45,181
57	MAS	17,190
57	WR	768
58	FRM	2,583
58	MAS	9,722
58	SWR	7,913
59	UNKNOWN	25
59	FRM	216,366
59	MAS	312,013
59	SWR	85,157
59	WR	92,486
60	FRM	99,559
60	MAS	591,009
60	SWR	127,632
60	WR	72,912
61	FRM	29,547
61	MAS	61,843
61	WR	12,525
62	FRM	175,095
62	MAS	802,677
62	SWR	157,632
62	WR	246,890
63	FRM	155,944
63	MAS	162,330
63	SWR	8,385
63	WR	17,996
64	FRM	13,091
64	MAS	46,852
64	SWR	2,197
64	WR	3,195
65	FRM	69,859
65	MAS	59,854
65	SWR	2,866
65	WR	100
66	FRM	21,209
66	MAS	21,811
66	SWR	1,559
66	WR	769
67	UNKNOWN	66
67	FRM	1,615,523
67	MAS	1,134,856
67	SWR	134,462
67	WR	232,409
68	FRM	216,099
68	MAS	382,887
68	SWR	71,229
68	WR	246
69	FRM	6,570
69	MAS	8,741
69	SWR	460
70	FRM	91,510
70	MAS	110,625

70	SWR	25,497
70	WR	82,208
71	FRM	21,691
71	MAS	39,773
71	SWR	3,017
71	WR	10,296
72	FRM	18,980
72	MAS	2,212
72	SWR	877
72	WR	17
73	UNKNOWN	189
73	FRM	352,695
73	MAS	2,075,017
73	SWR	589,199
73	WR	174,102
74	UNKNOWN	20
74	FRM	111,976
74	MAS	499,103
74	SWR	132,739
74	WR	182,838
75	FRM	314,883
75	MAS	178,697
75	SWR	157,075
75	WR	48,566
76	FRM	69,735
76	MAS	385,971
76	SWR	99,640
76	WR	62,663
77	FRM	10,768
77	MAS	64,087
77	SWR	15,310
77	WR	2,944
78	FRM	543
78	MAS	644
78	SWR	1,408
78	WR	1,258
79	FRM	31,592
79	MAS	97,427
79	SWR	15,392
79	WR	4,851
80	FRM	114,115
80	MAS	153,603
80	SWR	93,478
80	WR	8,216
81	FRM	139,291
81	MAS	1,278,331
81	SWR	452,755
81	WR	138,182
85	UNKNOWN	326
85	FRM	1,448,069
85	MAS	4,270,318
85	SWR	887,566
85	WR	1,626,178
86	FRM	3,342,765
86	MAS	2,620,765
86	SWR	464,014
86	WR	646,941
87	FRM	209,437

87	MAS	1,921,242
87	SWR	724,215
87	WR	393,625
88	FRM	20,940
88	MAS	97,078
88	SWR	40,607
88	WR	3,302
	TOTAL	88,792,662

COMMERCIAL CATASTROPHE MODEL SUPPORT DOCUMENT
RMS® RiskLink 6.0b

Part A

Note that responses to these questions have been compiled by two separate parties in two separate documents, the modeler, Risk Management Solutions in Part A, and the insurance company or authorized representative making this filing in Part B. The responses from the two separate parties are designated by dividers labeled "Following answer supplied by Risk Management Solutions, 2008" or "Answer supplied by the filing Insurance Company" as appropriate.

1. Identify the particular Catastrophe Model that is used in this filing to:

- **a. project hurricane losses**
- **b. determine probable maximum loss levels**
- **c. determine the cost of reinsurance**

This identification should include the name and location of the firm that created the model, the name of the model, and the version number of the model.

--*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

2. In an electronic format, provide the detailed input that you provided to the modeler along with a list of all adjustments made by you prior to giving the input to the modeler necessary to conform this input to the model's input requirements. Be sure to provide a detailed description of each data field. Include any default values that you specified for missing or invalid information. Describe any exposures affected by this filing that were not included in your input to the model. Describe any exposures included in your input to the model that are not part of this rate filing. Note – if the model was run in-house, you should still provide the detailed input along with a statement of who was responsible for running the model and what controls were in place to ensure that the version of the model provided to you was not altered.

--*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

3. In an electronic format, provide the ACTUAL complete model output, documentation, and reports provided to you by the modeler (or produced by you if you ran this model in-house).

--- --*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

4. **Provide an explanation with appropriate supporting information showing how the results from the model were included in column (20) of the Standardized Rate Level Indications Form. No modifications or adjustments may be made to the results of the model.**

--*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

5. **Provide a listing of the experts that you relied on concerning those aspects of the model outside your area of expertise.**

--*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

6. **State the extent to which the model has been reviewed or opined on by experts in the applicable fields, including any known significant differences of opinion among experts concerning aspects of the model that could be material to your use of the model.**

--*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

7. **Provide the basic components of the model and your understanding of how such components interrelate within the model.**

---*Following answer supplied by Risk Management Solutions, 2008*

The RMS® U.S. Hurricane Model consists of four major model components, or modules:

- Stochastic Module
- Wind Field or Wind Hazard Module
- Vulnerability or Damage Assessment Module
- Financial Loss Module

Descriptions of each of the modules follow.

Stochastic Module

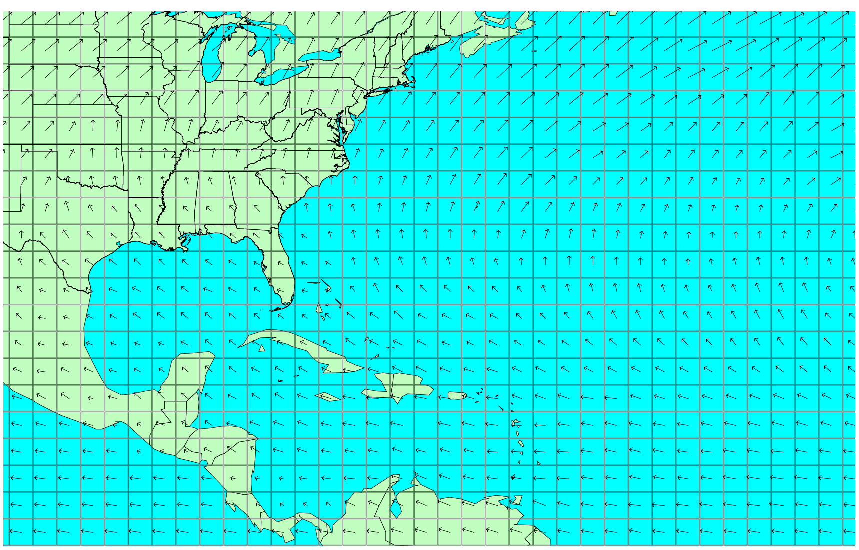
The following steps describe the methodology used to generate stochastic storms at a location:

Step 1: Quantify the translational velocity characteristics of the historical storm set.

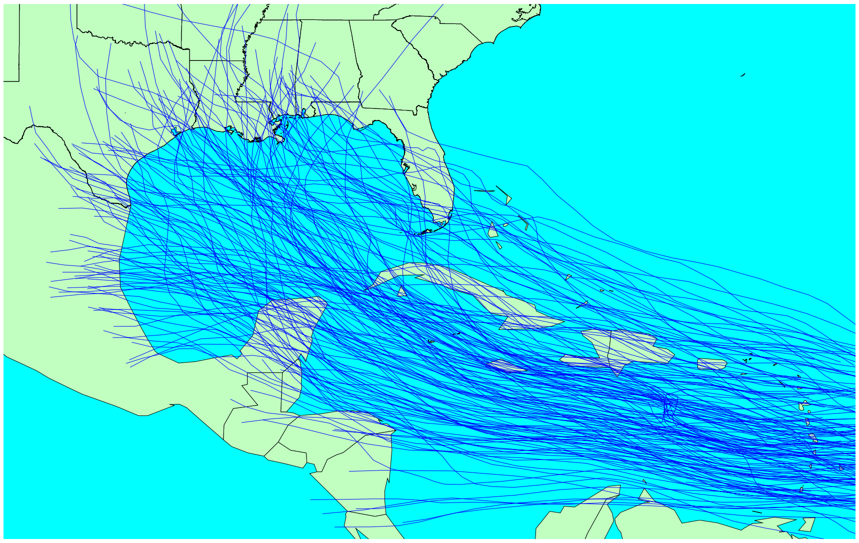
Stochastic (simulated) storms are derived from the analysis and parameterization of historical storm data. The historical storm database was developed with the participation of Charles J. Neumann, a meteorologist and one of the original researchers from the National Hurricane Center (NHC), who compiled the HURDAT Atlantic basin storm database (Jarvinen, et al. 1984). The HURDAT database contains four pieces of information for each recorded tropical cyclone: time and date, latitude and longitude position, maximum sustained wind speed, and central pressure (when available). Working with Mr. Neumann, RMS engineers researched the background data on historical storms as well as specific information on several hurricanes. The key background references include Schwerdt et al. (1979), Neumann (1987, 1999), Ho et al. (1987), and Simpson et al. (1981). The RMS historical database was developed by incorporating the most reliable available information from this research. The investigation resulted in a more accurate definition of storm characteristics at landfall. Only storms that reached Category 1 or above were used in the development of the model. RMS consulted with other experts, including Dr. Alan Davenport and Dr. Dale Perry, to collect more data and to seek their opinion on specific storms. The final RMS-developed database was again reviewed by Charles Neumann. Results of the NHC re-analysis project were also reviewed. The model uses a random-walk technique by considering each hurricane to be advected by a 2D "turbulent" translational velocity field superimposed on a "mean" translational velocity field. Both mean and turbulent velocity fields are inhomogeneous in two dimensions so the translation equations have been formulated to incorporate the interaction of these inhomogeneities. Model inputs are computed from the tracks of historical events in the HURDAT catalog on a regular array of grid cells covering the whole Atlantic basin as shown in the figure below. Historical tracks are classified into five types, depending on their point of formation and path. Each type is simulated separately.

- Type 1 storms (e.g., Floyd 1999) form in the Atlantic Ocean and curve up the East Coast of the U.S.
- Type 2 storms (e.g., Georges 1998) form in the Atlantic Ocean and do not curve up the East Coast of the U.S.
- Type 3 storms form off the East Coast of the U.S.
- Type 4 storms (e.g., Mitch 1998) form in the Caribbean Sea.
- Type 5 storms (e.g., Opal 1995) form in the Gulf of Mexico.

The second figure below shows a sample of 150 simulated 'Type 2' hurricane tracks.



Mean Translational Velocities for 'Type 2' Hurricanes on a 2º x 2º Grid



Sample of 150 Simulated 'Type 2' Hurricane Tracks

Step 2: Simulate the storm tracks and calibrate against historical rates of occurrence.

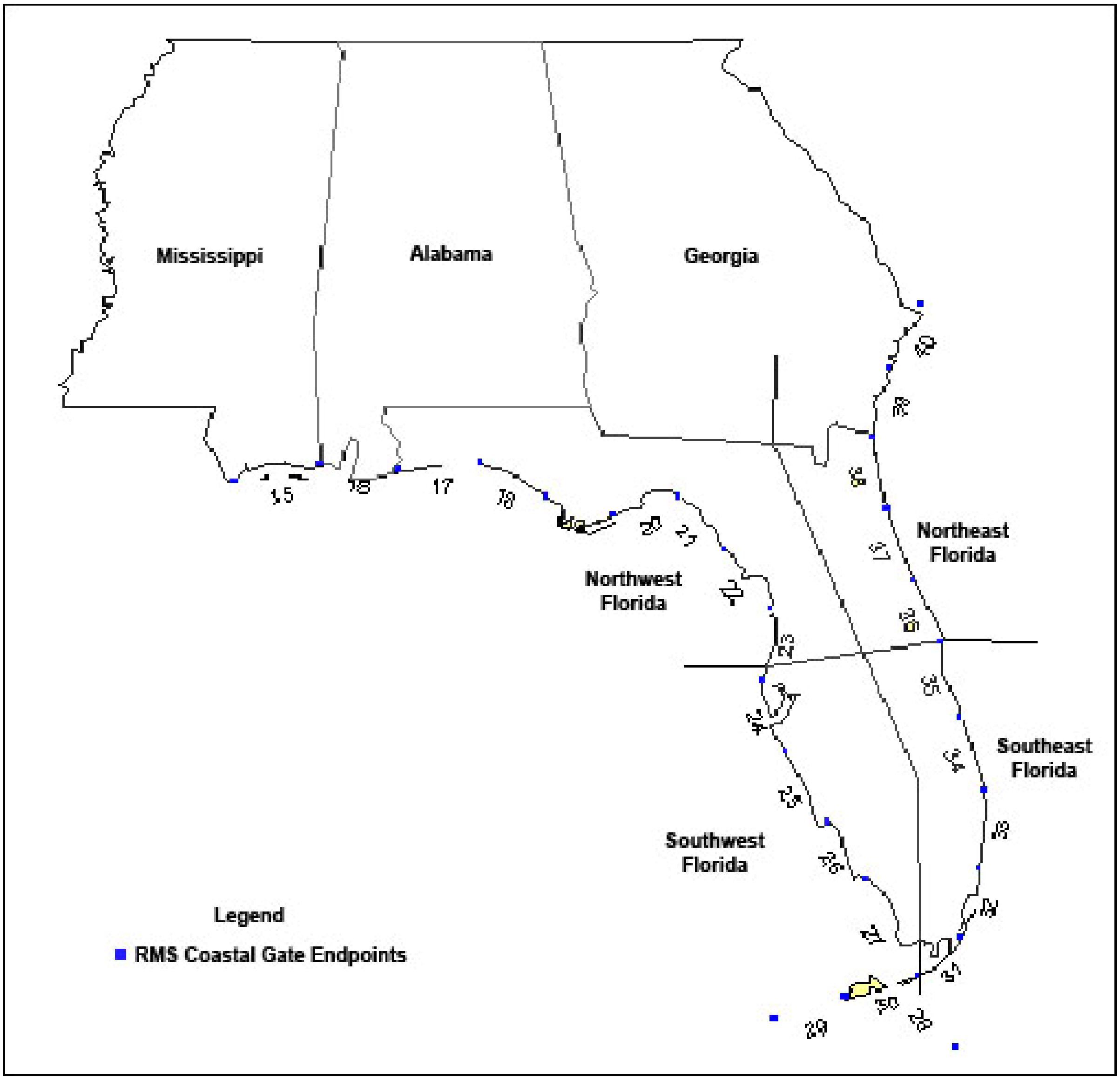
Storm tracks are simulated using a random-walk technique. This method creates realistic synthetic events covering the entire Atlantic basin, which preserve the statistical behavior of the historical events (mean and variance of translational velocity). The random-walk technique is widely used in the areas of environmental fluid mechanics, particularly to simulate the dispersion of pollutants (e.g., Luhar and Britter 1989). RMS is the first modeling company to apply this methodology to hurricane modeling (Drayton 2000). Each event consists of a track (location, forward speed and direction, central pressure and radius of maximum wind) defined throughout the life of the storm from its genesis to its dissipation.

Tracks are simulated in two steps. First, the tracks are created and second, pressure histories are added to the tracks using a random-walk technique for the pressure. The track model is calibrated across the Atlantic Ocean by comparing the rates of storms crossing a grid of cells covering the basin. A more detailed calibration is performed at the coastline by calculating the rate of crossing and probability density functions (pdf) of central pressure and forward speed on linear gates.

Step 3: Calculate target historical landfall rates and track parameter pdfs along the Florida coastline.

The U.S. coastline is first divided into segments about 50 nautical miles in length. This yields 22 coastal segments (segments 17 to 38) for the state of Florida as shown in the figure below. There are also four coastal segments to represent the coastline of the neighboring states of Georgia, Alabama, and Mississippi. Historical crossings are determined for each coastal segment by smoothing across extensions to the segments. Probability density functions for central pressure are developed for each segment from landfall data supplemented by nearby, offshore track information. Pressure cumulative distribution functions (cdfs) are then smoothed by normalizing landfall rates by category to match the historical record at a regional level.

Probability density functions of forward speed are developed for groups of coastal segments. Lower and upper bounds are developed for all parameters based on regional hurricane characteristics to keep the parameters within a realistic range.



Coastal Segments Used for Parameter and Rate-Smoothing

Step 4: Calibrate the storm tracks against landfall rates and forward speed pdfs at the coastline.

Calibration of landfall probabilities is performed on a series of segments, approximately 50 nautical miles in length that bound the entire U.S. coastline. The target historical probabilities are computed from the historical database using a smoothing algorithm that eliminates the spatial patchiness in the limited historical record. The stochastic model is then calibrated to match the historical rates of landfall.

Calibration of forward speeds is performed by computing pdfs of forward speed following the more traditional, general approach set forth in the National Weather Service publication NWS-38 (Ho et al., 1987). Due to the limited length of the historical record, the calibration is performed at a regional level by grouping neighboring gates together.

Step 5: Add the pressure histories to each stochastic event taking into account changes in sea surface temperature (SST) and encounters with land along the way.

Pressure histories are added to the synthetic tracks using a second random-walk process. The rates of change of pressure along the synthetic tracks are defined through the mean and variance of pressure changes quantified from historical events. Storms tend to intensify faster over warm water than over cold water. Storms fill as they cross areas of land and may re-intensify if they move back out over the water. The filling rates for storms making landfall in Florida are modeled using the same functional form as the model of Kaplan and DeMaria (1995). Minimum pressures are constrained by theoretical arguments relating central pressure to SST. The pressure history of each storm thus depends on the track of the storm as it crosses areas of different SST and encounters topography.

Step 6: Calibrate the pressure histories against the pressure pdfs for each coastal gate.

The pressure history model is calibrated by specifying the pressure pdf on linear segments across the basin and around the coastline. The pressure history of each event is individually scaled so that the pressure pdf for each segment is obtained. In this way the random-walk model defines realistic pressure histories and the calibration ensures the correct intensities of simulated storms.

Step 7: Perform importance sampling of the Monte Carlo basin-wide storm set to produce the event set used for loss-cost determination.

Importance sampling of the simulated tracks is performed to create the computationally efficient event set used for loss cost determinations. For average annual loss calculations, the hurricane model contains 19,047 stochastic storms affecting Florida.

Wind Field or Wind Hazard Module

The Wind Field or Wind Hazard Module calculations determine the maximum localized wind speed associated with a storm event (historical or stochastic) over its life cycle. The wind speeds are calculated at a site identified by its latitude and longitude, taken either from a street-address-specific geocode or derived from the weighted centroid of a ZIP Code. The key storm parameters used in wind speed calculations include: central pressure, radius to maximum wind, wind profile, forward speed, direction, landfall location, and track.

The theoretical and analytical formulations of the wind field model are taken from a methodology originally developed at the Boundary Layer Wind Tunnel, University of Western Ontario, Canada (Georgiou 1985 and Georgiou et al. 1983). The wind speed is calculated from the formula relating the site location relative to the storm track, the landfall location, and the physical parameters of the storm. The steps included in the wind field calculation are listed below.

Step 1: Estimate over-water gradient balance wind speed Vg.

The mean gradient wind speed, V_g, is calculated from the formula:

$$V_g = 0.5(V_T Sin(\alpha) - fR) + \left[0.25(V_T Sin(\alpha) - fR)^2 + \left(B\frac{\Delta P}{\rho} \right) \left(\frac{R_{\max}}{R} \right)^B e^{-\left(\frac{R_{\max}}{R} \right)^B} \right]^{\frac{1}{2}} \quad (1)$$

where:

R = radial distance from the storm to the site

α = angle from storm track to site (clockwise is positive)

ΔP = central pressure difference

V_T = storm translational speed

ρ = air density

f = Coriolis parameter (function of latitude)

B = pressure profile coefficient

R_{max} = radius to maximum winds

Step 2: Estimate over-water wind field at 10 meter height V_s.

The 10-minute sustained over-water wind speed, Vs, is a function of the gradient wind speed and the relative position of the site to the storm track and is obtained from:

$$\frac{V_s}{V_g} = a - e^{\left(-b\frac{R}{R_{max}} - c\left(\frac{R_{max}}{2R}\right)\right)} \quad (2)$$

where a, b, and c are constants, calibrated with H*WIND gridded data, that vary between left and right sides of hurricane track.

Step 3: Estimate over land peak gust.

The model calculates over land peak gust wind speeds at a location by modeling both the effects of the local surface roughness and any change in the surface roughness conditions upwind of the location being considered. As the upstream roughness generally varies with direction about a particular location, the model considers the effects of upstream roughness by direction. The treatment of both surface roughness effects on mean and gust wind speed changes are modeled based on peer-reviewed wind engineering literature (Cook, 1985; Wieranga, 1993 and 2001)

The starting point for the determination of land friction effects is the creation of a database that describes the surface roughness in terms of the roughness length. The definition of the roughness length arises from the use of a logarithmic velocity, or log-law, profile to describe the variation of the wind speed with height in the region immediately adjacent to the surface. Use of the log-law requires a measure of the underlying surface roughness, which is achieved through the use of the roughness length to parameterize the effect of surface roughness on the wind speed. The use of a roughness length also allows a physically based model to be used to calculate both local and upstream surface-roughness effects on the wind speed.

The database itself is created using the National Land Cover Data (NLCD) dataset produced by the USGS. This dataset is derived from early to mid-1990s Landsat Thematic Mapper satellite data and provides coverage of the entire continental U.S. at a horizontal resolution of 30 meters, using a 21-class land-cover classification scheme. This dataset has been supplemented by ASTER (Advanced Spaceborne Thermal Emission and Reflection Radiometer) satellite imagery to ensure the land use classification is timely with respect to current conditions in Florida. RMS then undertakes further processing of areas classified as urban or suburban in this database in order to differentiate areas of differing building heights. This is done primarily using data on the construction square footage by ZIP Code. At the same time, those land-cover classes whose effects on the surface wind speed are similar are merged into a single land-use class. The end result is a 10-class land-cover database with land-cover classes ranging from water to high-rise buildings. Finally, a representative roughness length is assigned to each of the 10 land-cover classes, using published mapping schemes from the scientific literature. The approaches used to develop roughness lengths have been independently reviewed by Dr. Nicholas Cook and Dr. Craig Miller.

Coefficients describing the impact of land friction are then calculated by using the roughness database in conjunction with GIS software to sample both the local and upstream-roughness conditions by direction at each point of interest. As the upstream roughness will generally vary with direction about a particular location, sampling of the upstream roughness must also be undertaken by direction. Information on the sampled roughness length values and their distance from the location are then used in conjunction with a physically based model to determine an appropriate set of coefficients describing the impact of land friction effects at the location by direction.

Vulnerability or Damage Assessment Module

The vulnerability functions consist of a matrix of wind speed levels (measured as peak gust in mph) and corresponding MDRs. To calculate a MDR for a given location, RiskLink first determines an expected wind speed, and then looks up the corresponding MDRs for building and contents based on the building classification. RMS has also developed CVs associated with each MDR. The CV is used to develop a probability distribution for the damage at each wind speed and for each classification. A beta distribution is used for this purpose.

The vulnerability relationships are developed using structural and wind engineering principles underlying the RMS Component Vulnerability Model (CVM) (Khanduri, 2003) coupled with analysis of historical storm loss data, building codes, published studies, and RMS internal engineering developments in consultation with wind engineering experts including the late Dr. Dale Perry and Dr. Norris Stubbs of Texas A&M University. The CVM allows objective modeling of the vulnerability functions, especially at higher wind speed ranges where little historical loss data is available. The CVM is also used to obtain the vulnerability relativities by building class and gain insight into the effects of hurricane mitigation. These approaches also build on the earlier input received from Dr. Peter Sparks of Clemson University, and Dr. Alan Davenport of the University of Western Ontario.

The engineering model based on the CVM is calibrated using historical claims data at ZIP Code resolution for building, contents, and business interruption/additional living expense coverages. The calibration process involves a comparison of modeled MDR with that obtained from observed losses. Since the vulnerability model is a function of the wind speed, the calibration involves varying both wind speed and vulnerability within the bounds established by i) the science and historical observations governing the hazard at a given location and ii) the engineering and historical observations governing the damageability of property at that location. Thus, one primary goal of calibration is to ensure that the vulnerability function is confined within the high and low vulnerability bounds as established by the CVM.

RMS also uses published documents, expert opinion, and conventional structural engineering analysis. RMS has reviewed research and data contained in numerous technical reports, special publications, and books related to wind engineering and damage to structures due to wind. References are provided in G-1.4 of the FCHLPM submission referred to above as document a) of question 5.

The RMS engineering staff includes several engineers with Ph.D. qualifications in Civil and Structural Engineering. These engineers have significant experience and expertise in the understanding of building performance and structural vulnerability, and are dedicated to the development of vulnerability relationships for risk models worldwide. RMS engineers have participated in several reconnaissance missions; see Table 10 for more detail.

The knowledge and data gathered during these site visits has been used in the calibration and validation of vulnerability functions. The final calibration of the vulnerability functions has been made using over $9 billion of loss data, with corresponding exposure information.

The vulnerability of buildings modeled by each of the building classes represents the "average" vulnerability of a portfolio of buildings in that class. The vulnerability will vary depending upon specific characteristics of buildings in that portfolio. This variation can be addressed in the model through the use of secondary modifiers that can consider secondary building characteristics or mitigation measures to improve a building's wind resistance. The secondary modifiers could be building-characteristic specific (e.g., improved roof sheathing or anchors) or external (e.g., storm shutters). These secondary modifiers modify the base, "average" vulnerability functions according to specific building characteristics or mitigation measures.

Financial Loss Module

To calculate losses, the damage ratio for each stochastic event derived in the Vulnerability Module is translated into dollar loss by multiplying the damage ratio (including loss amplification as appropriate) by the value of the property. This is done for each coverage at each location. Using the mean and coefficient of variation, a beta distribution is fit to represent the loss distribution. From the loss distribution one can find the expected loss and the loss corresponding to a selected quantile.

RiskLink uses the loss distribution to estimate the portion of loss carried by each participant within a financial structure (insured, insurer, reinsurer). This distribution is used to calculate the loss net of any deductibles and limits.

Demand surge impacts on estimated losses are incorporated in the Post-event Loss Amplification (PLA) component of the U.S. Hurricane Model. This component estimates the degree to which losses are escalated by a combination of economic, social and operational conditions that follow after a given event. The PLA component accounts for three separate mechanisms of escalation arising from:

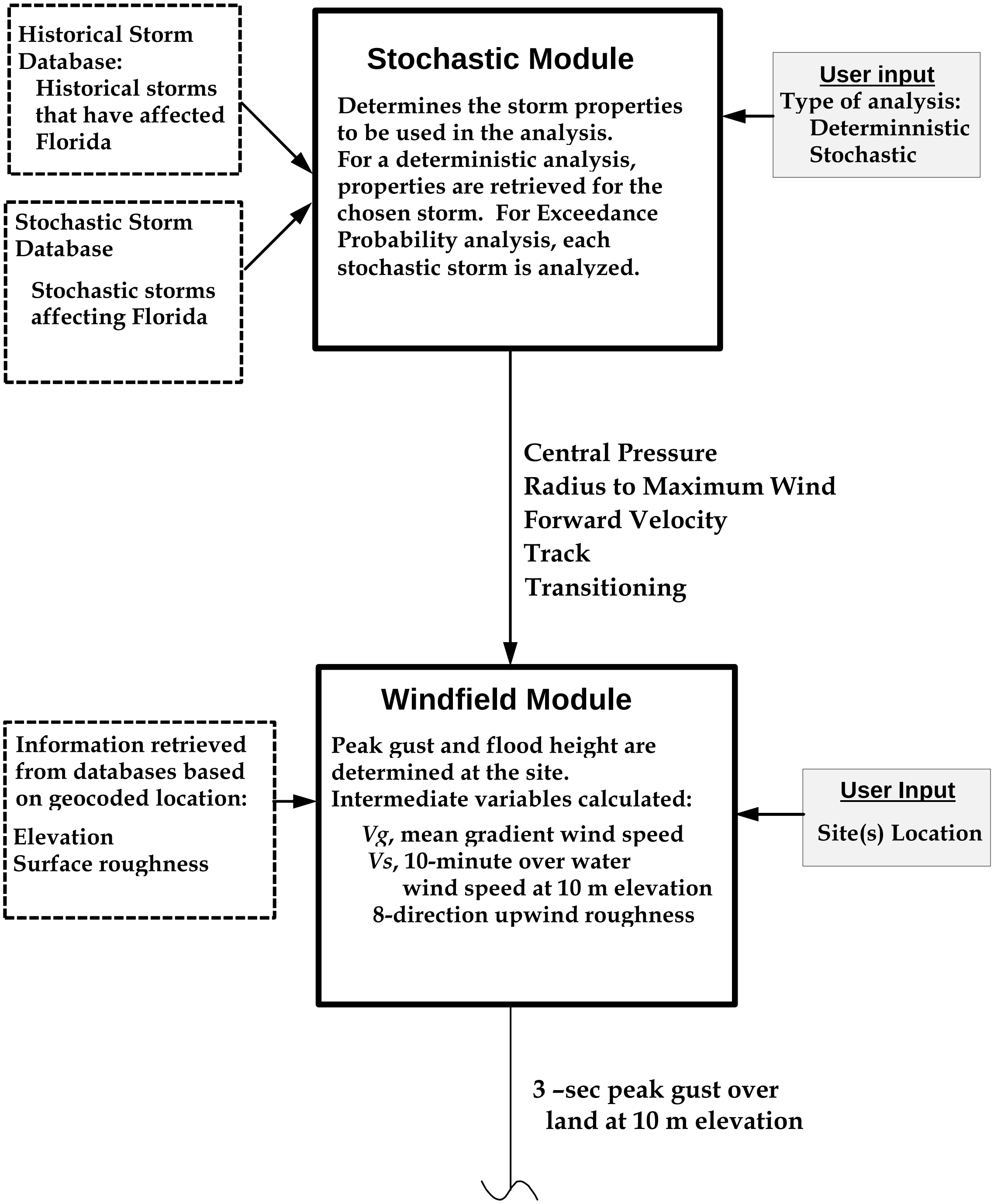
1) Economic Demand Surge (EDS): increase in the costs of building materials and labor costs as demand exceeds supply
2) Claims inflation (CI) – cost inflation due to the difficulties in fully adjusting claims following a catastrophic event
3) Super CAT scenarios – coverage and loss expansion due to a complex collection of factors such as containment failures, evacuation effects, and systemic economic downturns in selected urban areas.

These loss amplification factors are developed for each stochastic event in the model by coverage and applied to the damage ratio on a ground up basis.

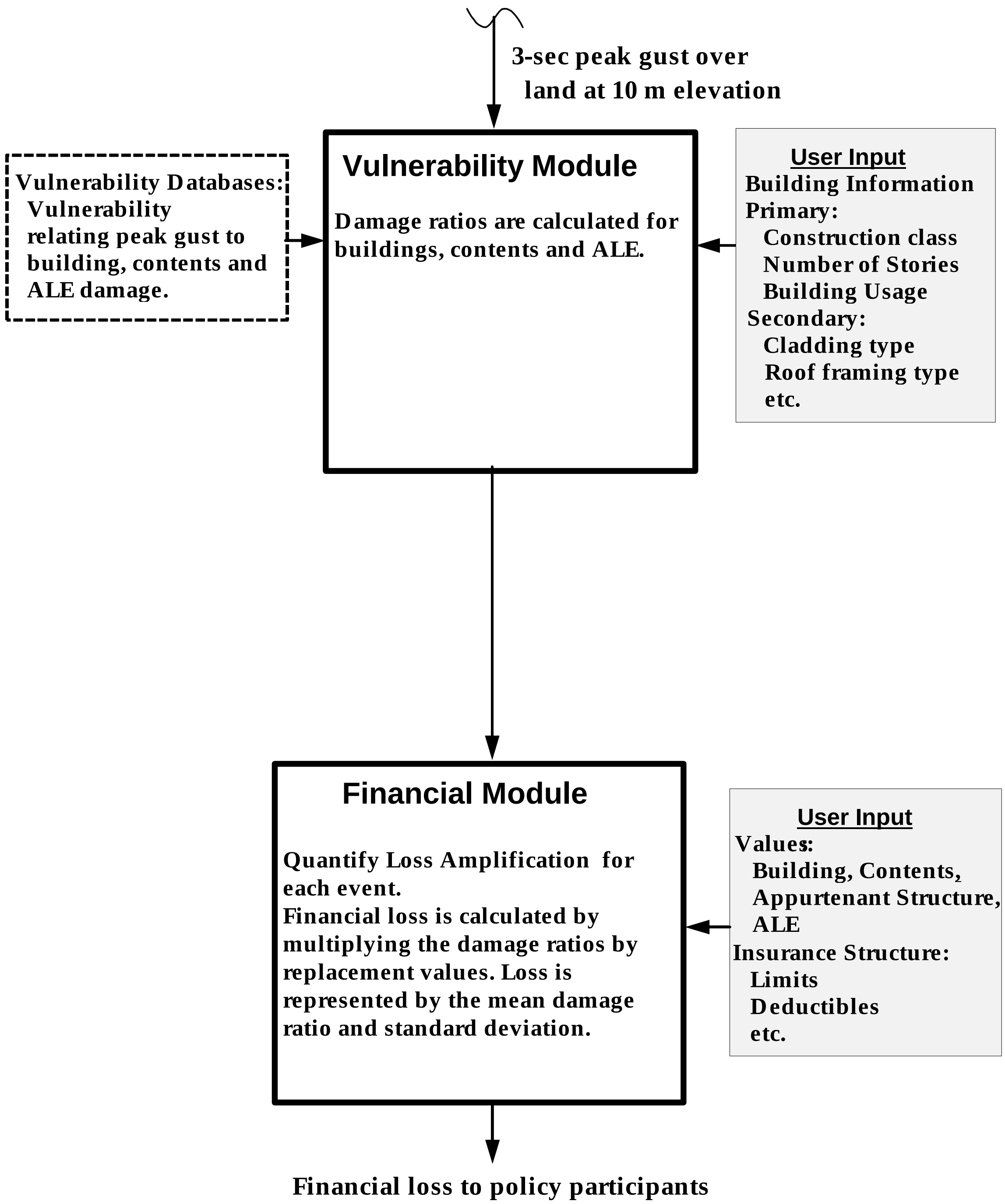
Relationship of the Components

The high-level flow chart is shown in the figure below.

Model Flowchart



Model Flowchart (*continued*)



Abbreviation
Additional Living Expense (ALE)

Flow Diagram of Major Model Components

8. Explain how the model was tested or validated and the level of independent expert review and testing.

--*Following answer supplied by Risk Management Solutions, 2008*

As addressed in various questions in this document the U.S. Hurricane Model undergoes extensive testing, including validation. Details on validation are described in question 27.

Independent expert review and testing is described in the response to question 29.

9. Explain how you determined that the particular model you used was appropriate for use in this filing.

--*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

10. Explain how you examined the model output for reasonableness, considering factors such as the following:

a. The results derived from alternate models or methods.

b. How historical observations compare to the results produced by the model.

c. The consistency and reasonableness of relationships among various output results.

d. The sensitivity of the model output to variations in your input and model assumptions.

--*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

11. Provide all available comparison of model results with actual historical observations for your company or group. These comparisons should be provided by program/product line and territory within program/product line.

--*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

12. State and provide complete support for the credibility that you have assigned to the output of the model by program/product line and territory within program/product line.

--*Answer supplied by the filing Insurance Company*

(Please see attached document (Part B) for insurance company/authorized representative response.)

13. Provide the hurricane data set used to develop the model. Include the source of this information. For any hurricanes not included in the Official Hurricane Set of the Florida Commission on Hurricane Loss Projection Methodology, provide an overall estimate of their impact on the loss cost projections. Also, explain why they are included and provide complete supporting data/information. Finally, state whether or not the Official Hurricane Set has been similarly altered in past versions of the model.

--*Following answer supplied by Risk Management Solutions, 2008*

The hurricane set used by the RMS U.S. Hurricane Model for Florida includes both landfalling and by-passing hurricanes that produce losses in Florida. The hurricane set used by RMS matches the HURDAT database as of January 8, 2008.

Previous versions of the model have complied with the Official Hurricane Set of the Florida Commission on Hurricane Loss Projection Methodology in a similar fashion.

14. Identify the hurricane characteristics (e.g., central pressure or radius of maximum winds) that are used in the model. For hurricane characteristics modeled as random variables, provide the probability distributions used along with complete supporting data/information for the derivation and reasonableness of each distribution.

--*Following answer supplied by Risk Management Solutions, 2008*

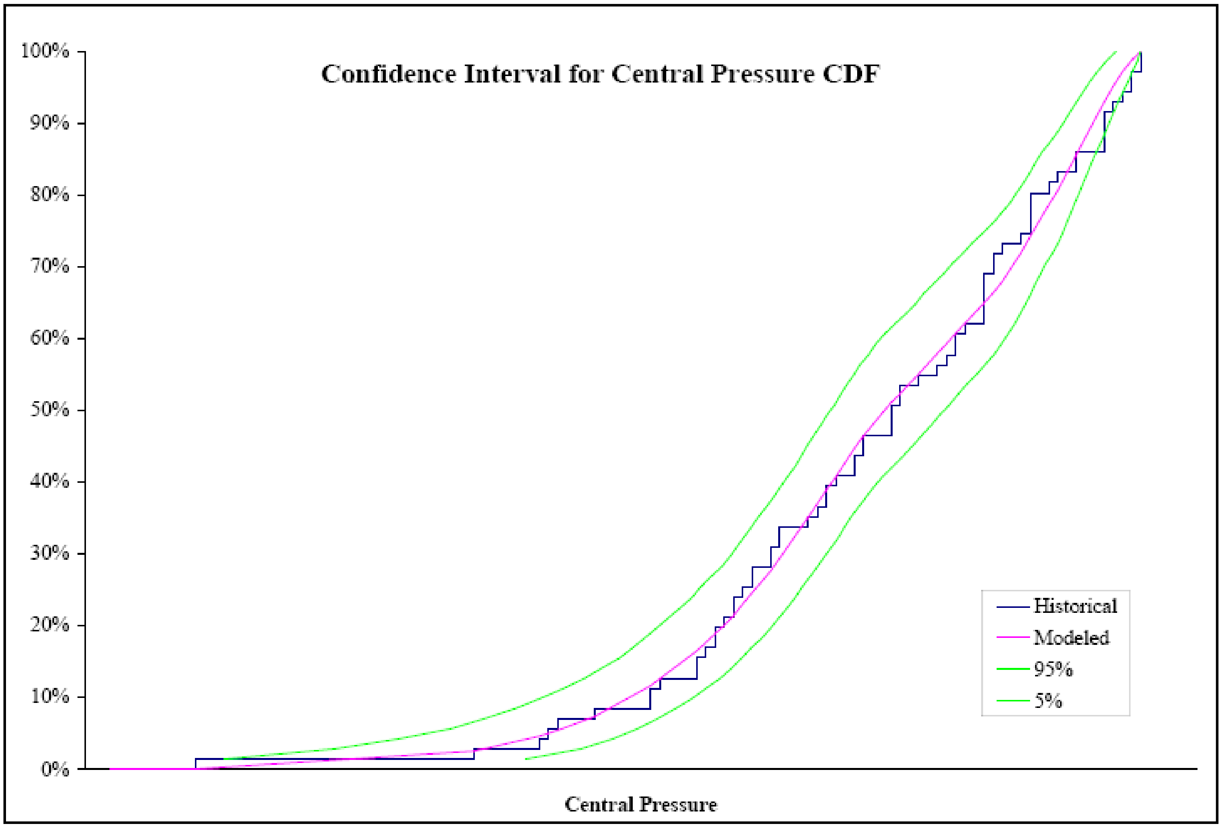
The hurricane parameters used in the model include: landfall rates, central pressure, forward velocity, radius of maximum wind, and storm position (latitude and longitude).

A list of variables and the distributions RMS uses for each follows.

Central Pressure

RMS uses a smoothed empirical distribution by landfall gate. The pressure history model is calibrated by specifying the pressure pdf on linear segments across the basin and around the coastline. The pressure history of each event is individually scaled so that the pressure pdf for each segment is obtained. In this way the random-walk model defines realistic pressure histories and the calibration ensures the correct intensities of simulated storms.

RMS performed Kolmogorov-Smirnov and chi-square goodness-of-fit tests for the cumulative distribution function. Because the modeled distribution is a smoothed version of the historical data, the p-values for these tests showed a reasonable agreement with the historical data. The data used for the central pressure comes from the National Hurricane Center HURDAT database from 1900-2000 and validated using National Hurricane Center HURDAT database as of January 8, 2008 with updates for the 2007 hurricane season obtained from the National Hurricane Center storm reports. The modeled fit of the central pressure distribution compares well with the historical central pressure distribution and is illustrated below.

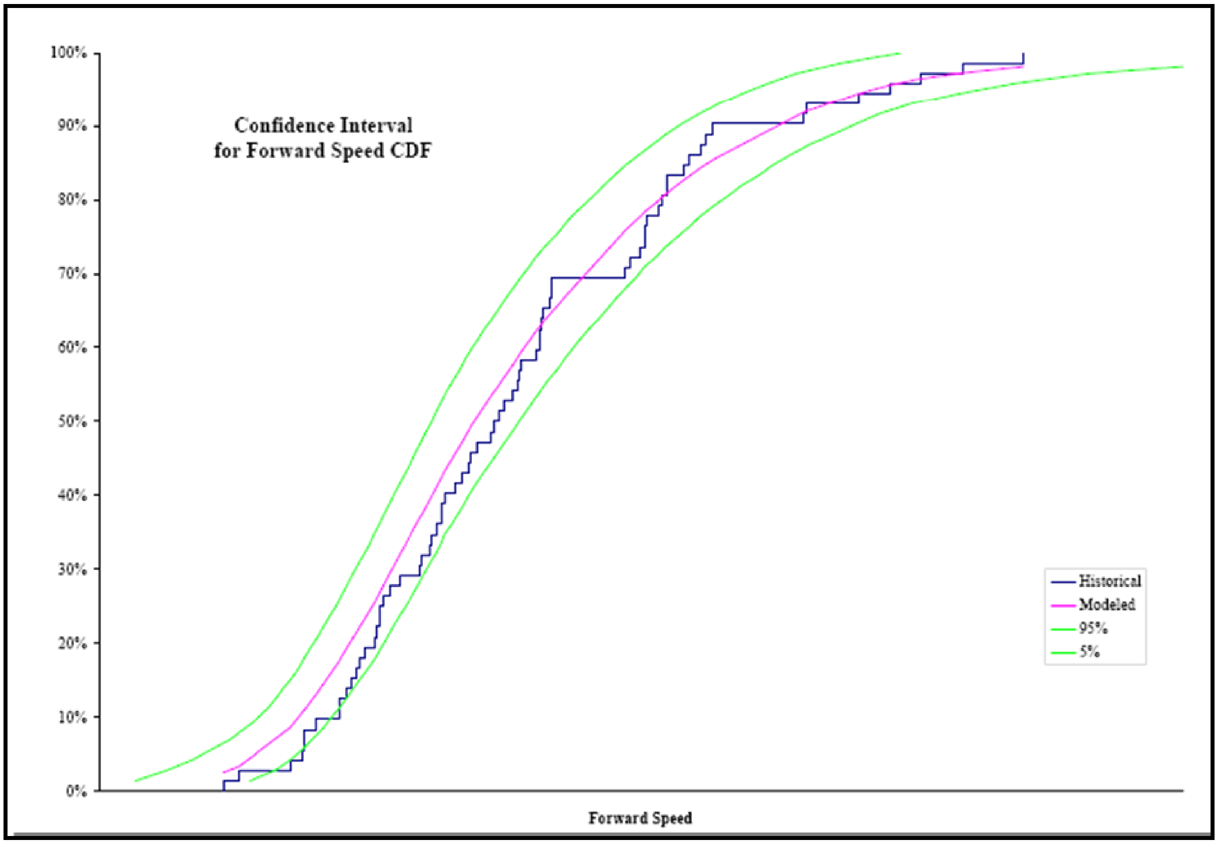


The figure above illustrates the cumulative frequency distribution as well as 5 and 95 percentile overlays for the RMS hurricane modeled central pressure variable.

Forward Speed

RMS uses a smoothed empirical distribution by landfall gate. Calibration of forward speeds is performed by computing pdfs of forward speed following the more traditional, general approach set forth in the National Weather Service publication NWS-38 (Ho et al., 1987). Due to the limited length of the historical record, the calibration is performed at a regional level by grouping neighboring gates together.

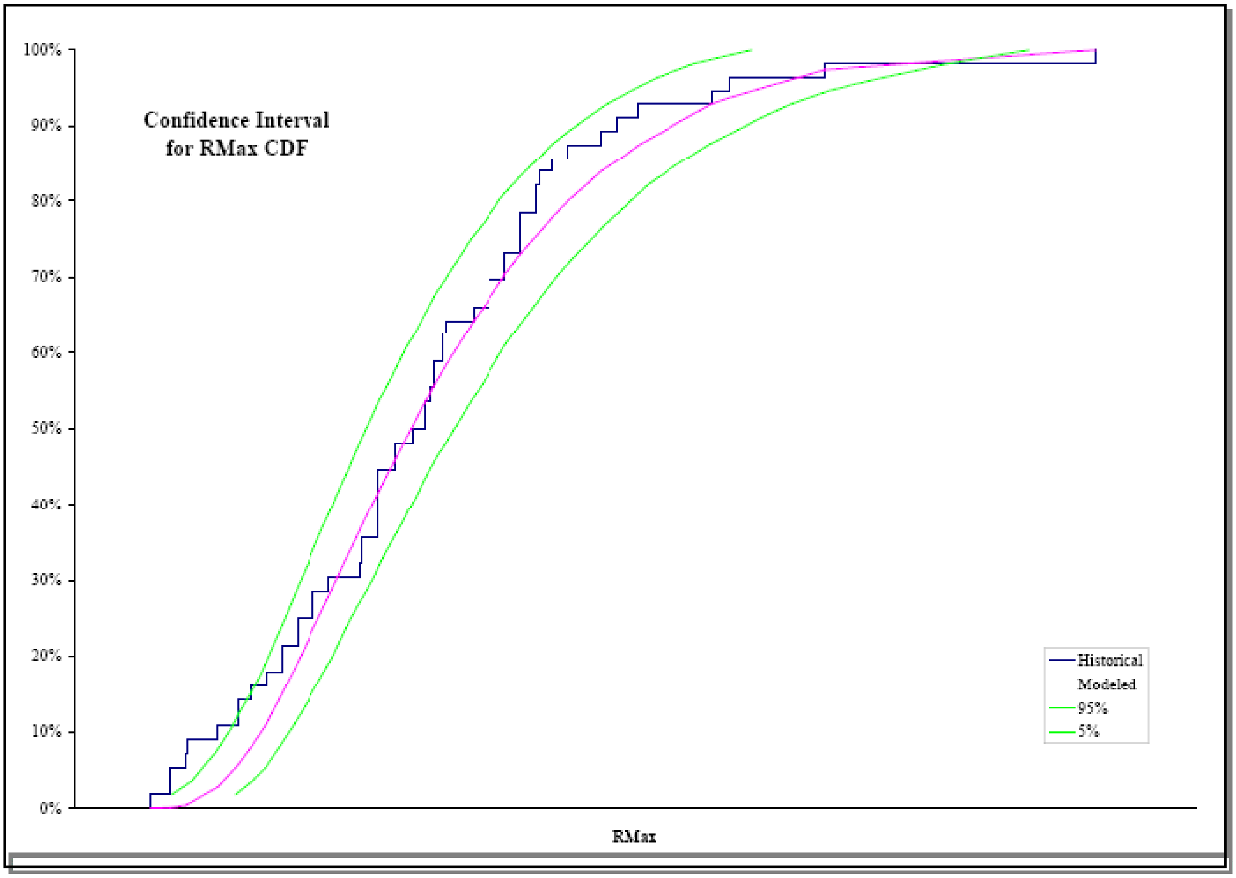
RMS performed Kolmogorov-Sminov and chi-square goodness-of-fit tests for the cumulative distribution function. Because the modeled distribution is a smoothed version of the historical data, the p-values for these tests showed a reasonable agreement with the historical data. The data used for forward speed comes from the National Hurricane Center HURDAT database from 1900-2000 and validated using National Hurricane Center HURDAT database as of January 8, 2008 with updates for the 2007 hurricane season obtained from the National Hurricane Center storm reports.



The figure above illustrates the cumulative frequency distribution as well as 5 and 95 percentile overlays for the RMS hurricane modeled forward speed variable.

Radius to Maximum Winds

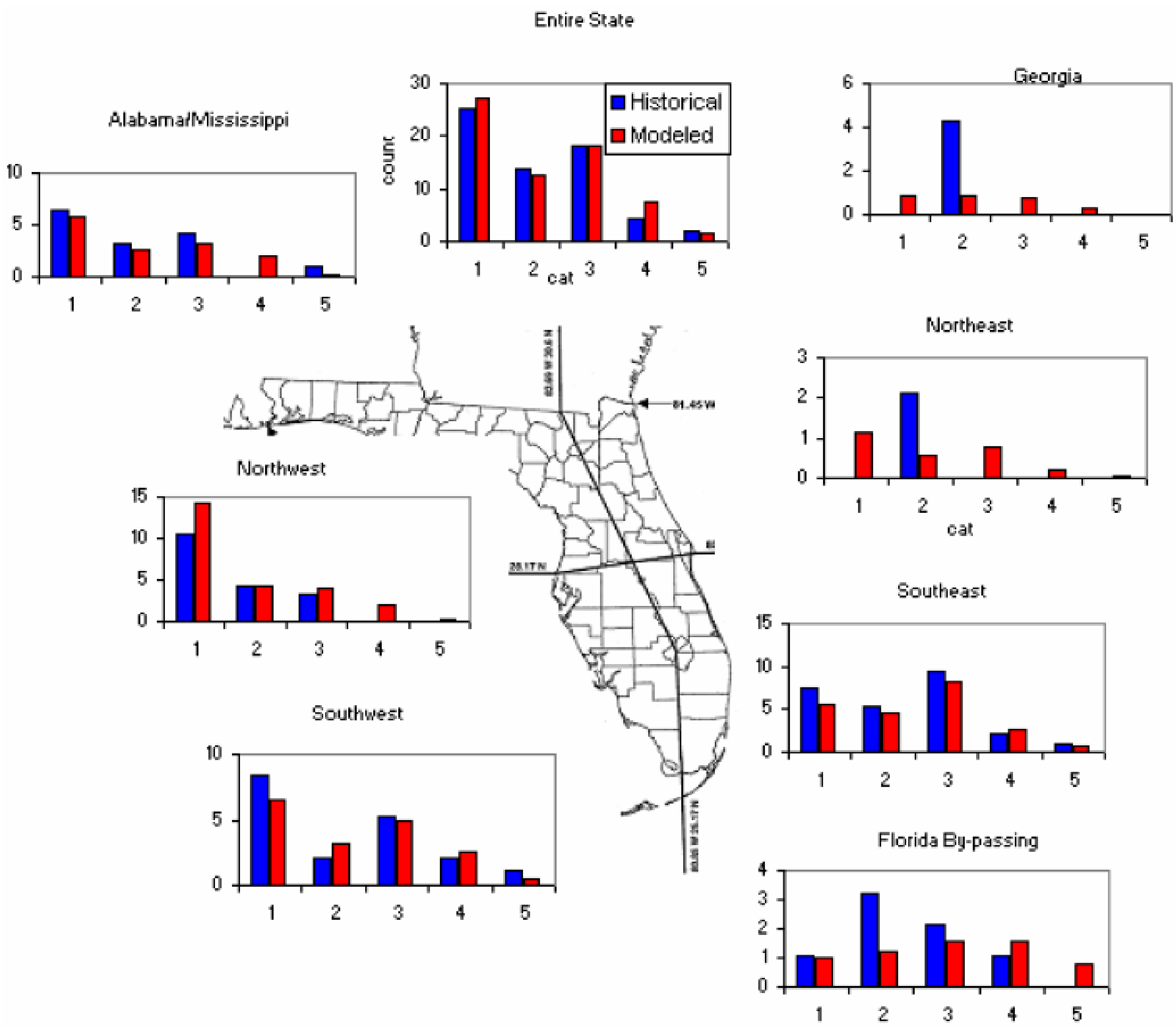
RMS uses a lognormal distribution, truncated to two standard deviations. The mean and standard deviation are a function of the central pressure and the latitude of the storm at landfall. RMS performed Kolmogorov-Sminov and chi-square goodness-of-fit tests for the cumulative distribution function. The p-values for these tests showed a reasonable agreement with the historical data. The data used for the radius to maximum wind relationship consists of a combination of Extended Best Track data (Mark DeMaria) from 1988-2000, the H*Wind data from 2000-2005 and also data from NWS 23 & 38. The following graph shows the distribution of radius to maximum winds for the Florida event set, along with the historical verification of storms from the 2004 and 2005 hurricane seasons.



The figure above illustrates the cumulative frequency distribution as well as 5 and 95 percentile overlays for the RMS hurricane modeled radius to maximum wind speed variable.

Landfall Frequency

RMS uses a Poisson frequency distribution by landfall gate. The means of these distributions are estimated by smoothing the number of historical landfalls. RMS performed tests using the Neyman-Scott and conditional chi-squared statistics. The p-values for these tests showed a reasonable agreement with the historical data. Questions 33 and 37 discuss the treatment of landfall frequency in more detail. The data used for landfall frequency comes from the National Hurricane Center HURDAT (1900-2007), NWS 23 & 38 and supplemented by National Hurricane Center storm reports.



The figure above illustrates the by-region and by Saffir-Simpson Category comparison of the RMS hurricane modeled landfall rates to the 1900-2005 historical storm baseline.

Data Sources

Access to the H*Wind data is available through the Hurricane Research Division website at http://www.aoml.noaa.gov/hrd/data_sub/wind.html. Individual storm reports are available through the National Hurricane Center website at http://www.nhc.noaa.gov. Extended Best Track data is available through ftp://ftp.cira.colostate.edu/demaria/ebtrk/.

15. Provide all the vulnerability functions used in the model along with complete supporting data/information for the derivation and reasonableness of each function.

--*Following answer supplied by Risk Management Solutions, 2008*

There are a total of 536 building vulnerability classes per vulnerability region. Each class has both building and contents damage functions. The various vulnerability classes were defined to allow for the grouping together of structures with similar performance under wind loads. The vulnerability classes depend on a combination of:

- Construction Material
- Building Height (number of stories)
- Building Occupancy
- Year Built
- Region of State (vulnerability region)

The possible classifications are listed in the following table.

RMS Hurricane Primary Building Classification Options

Construction Class
Unknown
Wood Frame
Masonry
Reinforced Concrete or Steel – Monolithic Deck
Concrete Tilt-Up
Reinforced Concrete or Steel – Panelized Deck
Light Metal Frame
Mobile Home w/o Tie-Downs

# of Stories
Unknown
1 - 3
4 - 7
8 - 14
15+

Occupancy
Unknown
Single Family Residential
Condo Unit Owners
Condo Association
Temporary Lodging
Retail Stores
Office Buildings
Restaurants
Agricultural Facilities
Religion
Education Gasoline Service Stations General Commercial General Industrial Parking

Year Band
Unknown
Pre 1995
1995-2001
2002 +later

Vulnerability Regions represent counties within the state where the performance of the building is different because of different construction practices related to building code adoption, enforcement, or material selection/styles.

The vulnerability functions consist of a matrix of wind speed levels (measured as peak gust in mph) and corresponding MDRs. To calculate a MDR for a given location, RiskLink first determines an expected wind speed, and then looks up the corresponding MDRs for building and contents based on the building classification. RMS has also developed CVs associated with each MDR. The CV is used to develop a probability distribution for the damage at each wind speed and for each classification. A beta distribution is used for this purpose.

The vulnerability relationships are developed using structural and wind engineering principles underlying the RMS Component Vulnerability Model (CVM) (Khanduri, 2003) coupled with analysis of historical storm loss data, building codes, published studies, and RMS internal engineering developments in consultation with wind engineering experts including the late Dr. Dale Perry and Dr. Norris Stubbs of Texas A&M University. The CVM allows objective modeling of the vulnerability functions, especially at higher wind speed ranges where little historical loss data is available. The CVM is also used to obtain the vulnerability relativities by building class and gain insight into the effects of hurricane mitigation. These approaches also build on the earlier input received from Dr. Peter Sparks of Clemson University, and Dr. Alan Davenport of the University of Western Ontario.

The engineering model based on the CVM is calibrated using historical claims data at ZIP Code resolution for building, contents, and Additional Living Expenses (ALE) coverages. The calibration process involves a comparison of modeled MDR with that obtained from observed losses. Since the vulnerability model is a function of the wind speed, the calibration involves varying both wind speed and vulnerability within the bounds established by i) the science and historical observations governing the hazard at a given location and ii) the engineering and historical observations governing the damageability of property at that location. Thus, one primary goal of calibration is to ensure that the vulnerability function is confined within the high and low vulnerability bounds as established by the CVM.

RMS also uses published documents, expert opinion, and conventional structural engineering analysis. RMS has reviewed research and data contained in numerous technical reports, special publications, and books related to wind engineering and damage to structures due to wind.

The RMS engineering staff includes several engineers with Ph.D. qualifications in Civil and Structural Engineering. These engineers have significant experience and expertise in the understanding of building performance and structural vulnerability, and are dedicated to the development of vulnerability relationships for risk models worldwide.

The knowledge and data gathered during these site visits has been used in the calibration and validation of vulnerability functions. The final calibration of the vulnerability functions has been made using over $9 billion of loss data, with corresponding exposure information.

The vulnerability of buildings modeled by each of the building classes represents the “average” vulnerability of a portfolio of buildings in that class. The vulnerability will vary depending upon specific characteristics of buildings in that portfolio. This variation can be addressed in the model through the use of secondary modifiers that can consider secondary building characteristics or mitigation measures to improve a building’s wind resistance. The secondary modifiers could be building-characteristic specific (e.g., improved roof sheathing or anchors) or external (e.g., storm shutters). These secondary modifiers modify the base, “average” vulnerability functions according to specific building characteristics or mitigation measures.

16. Provide any other distributions, functions, formulas, assumptions, factors, etc used in the model. Include complete supporting data/information for the derivation and reasonableness of each distribution, function, formula, assumption, factor, etc.

--*Following answer supplied by Risk Management Solutions, 2008*

Equations, materials and supporting information used in the selection or derivation of distributions, functions, formulas, assumptions and factors are provided throughout this document.

17. Show how all the distributions, functions, formulas, assumptions, factors, etc interact to produce the final loss cost projections of the model.

--*Following answer supplied by Risk Management Solutions, 2008*

Please refer to the answer for question 7 for information on how distributions, functions, formulas, assumptions, factors, etc. interact to produce the final loss cost projections of the model.

18. Demonstrate that loss cost relationships by type of coverage (structures, appurtenant structures, contents, additional living expenses) are consistent with actual insurance data. Include and identify the actual insurance data.

--*Following answer supplied by Risk Management Solutions, 2008*

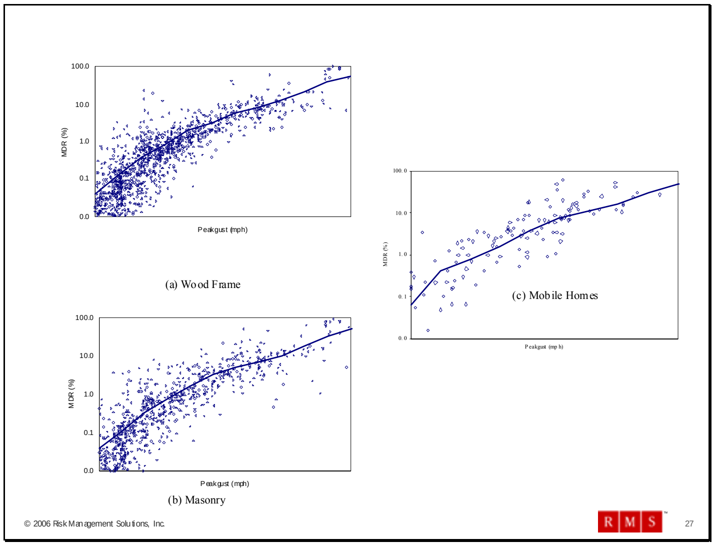
Losses to contents and ALE coverages are dependent on the damage to the structure. For example, from an engineering standpoint, losses to contents will be relatively small in comparison to structure losses until the envelope of the structure is breached. At that point, both structure and contents damage functions will quickly escalate with increasing wind speeds with the contents damage curve approaching that of the structure. Similarly, time element loss ratios will be small compared to structure loss ratios up to the point where the structure is severely damaged resulting in the building being uninhabitable.

Contents damage curves have been calibrated/validated based upon actual coverage-specific loss data and hence reflect historical insurance loss experience. The relative structure to contents/ALE damage ratios for the data reviewed follows the general engineering principles outlined in the paragraph above.

19. Demonstrate that loss cost relationships by construction type or vulnerability function (frame, masonry, mobile home) are consistent with actual insurance data. Include and identify the actual insurance data.

--*Following answer supplied by Risk Management Solutions, 2008*

Frame, masonry, and mobile home vulnerability curves reflect the actual hurricane loss data upon which the curves are largely based. Example plots of claims and vulnerability functions are displayed in the exhibit below.



20. Demonstrate that loss cost relationships among coverages, territories, and regions are consistent and reasonable.

---*Following answer supplied by Risk Management Solutions, 2008*

Loss costs relationships between coverages, territories, and regions generated by the hurricane model are consistent and reasonable. The general trend is for loss costs to be greatest in areas of past historical hurricane activity and greater on the coast than inland.

21. Describe the methods used in the model to treat deductibles (both flat and percentage), policy limits, replacement costs, and insurance-to-value when projecting loss costs.

---*Following answer supplied by Risk Management Solutions, 2008*

RiskLink uses a distributed approach for estimating losses net of deductibles and limits for each event. When projecting losses, RiskLink considers not only the mean damage ratio, but also the loss distribution around the mean. It does this by fitting a beta distribution by way of matching the first two moments of the distribution. The loss net of deductible and limit is calculated considering the pdf of the loss distribution between these two quantities as indicated in the example below.

Loss net of deductible and limit = $\int_{D}^{D+L} (x - D) f(x) dx + L[1 - F(D + L)]$

where
x = ground-up loss
D = deductible
L = limit
$f(x)$ = pdf of the ground-up loss
$F(x)$ = cdf of the ground-up loss

RiskLink computes the loss as a percentage of the property values, which are input parameters. The insured value is assumed to be the same as the property value unless a different insured value is input. If the insured value is lower than the property value, the insured value is treated as a limit to the insurer's liability.

RiskLink assumes that the property value input into it is the true property value. Any assumptions regarding insurance to value must be made by the user prior to running RiskLink.

RiskLink has separate inputs for values and limits. This gives it the flexibility to estimate policies with or without guaranteed replacement cost coverage. For example, assume an insurer has a policy on its books with an insured value of $100,000. If the insurer assumes that this policy is 10% underinsured, the value input is $100,000 / (1 – 0.1) = $111,111. If the policy has guaranteed replacement cost coverage, the limit input will also be $111,111. If the policy does not have guaranteed replacement cost coverage, the limit input will be $100,000.

22. Provide an example of how insurer loss (loss net of deductible) is calculated. Discuss data or documentation used to confirm or validate the method used by the model.

--*Following answer supplied by Risk Management Solutions, 2008*

Example of Insurer Loss Calculation

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)=(A)*(D)	(I)
Building Value	Policy Limit	Deductible	Mean Damage Ratio	Coefficient of Variation	α	β	Ground Up Loss	Loss Net of Deductible and Limit
100,000	90,000	2%	1.5%	4.184	0.041	2.716	$1,497.57	$1,224.68

In the table above, α and β are the parameters of a beta distribution with a mean of 1.5% and a coefficient of variation of 4.184.

The calculation of the loss net of deductibles as shown in the formula in the response to question 21is based on actuarial theory of deductibles and limits. See Hogg and Klugman, 1984. The distributions of the losses given that an event has occurred are validated using engineering studies and claims data.

23. Describe the methods used in the model to calculate loss costs for contents coverage.

--*Following answer supplied by Risk Management Solutions, 2008*

The damage to contents is a function of the amount of damage to the building structure and in particular of the damage to the roof, openings (i.e., windows and doors) and envelope (i.e., cladding). This function depends on the building class. The function establishes the rate at which damage to contents accumulates as a function of damage to the building structure.

The hurricane model has separate vulnerability functions for damage to contents associated with each of the hurricane building classes.

24. Demonstrate that loss cost relationships between structure and contents coverages are reasonable.

--*Following answer supplied by Risk Management Solutions, 2008*

RMS has used actual loss data to calibrate the contents vulnerability functions. The data collected and analyzed clearly validates the general engineering principals outlined in the paragraph above; at low wind speeds, the average levels of contents damage ratios are below the average levels of building/structure damage. At higher wind speeds, the ratios begin to converge.

25. Describe the methods used to develop loss cost for time elements coverage. State whether the model considers both direct and indirect loss to the structure. For example, direct loss is for amount paid to policyholders for loss of business income or rental value while businesses are being shut down for repair. Indirect loss is for the necessary expenses incurred during the "period of restoration" that would not have incurred if there had been no direct physical loss or damage to property.

--*Following answer supplied by Risk Management Solutions, 2008*

The hurricane model has separate time element vulnerability functions. There is a time element function for each occupancy class supported by the model. Time element vulnerability is related to the building damage state. Time element losses consider only direct losses (i.e., expense paid to a policy holder while the structure is being repaired). RMS has used actual loss data to calibrate time element vulnerability functions. Indirect losses are not separated from the actual loss data and therefore the modeled functions include both direct and indirect loss to the building.

26. Provide all comparisons of actual exposures and actual losses to modeled exposures and modeled losses for the model. These comparisons must be provided by line of insurance, construction type, policy coverage, county or other level of similar detail. Total exposure represents the total amount of insured values in the area affected by the hurricane. This would include exposures for policies that did not have a loss. If this is not available, use exposures for only those policies that had a loss. Specify which was used. Specify the name of the hurricane event for each comparison. List any data sources excluded from validation and the reason for excluding the data.

--*Following answer supplied by Risk Management Solutions, 2008*

The RMS model is able to reliably and without significant bias reproduce incurred losses on a large body of past hurricanes, both for personal residential and mobile homes. Validations of known storm losses have been performed in several ways, including:

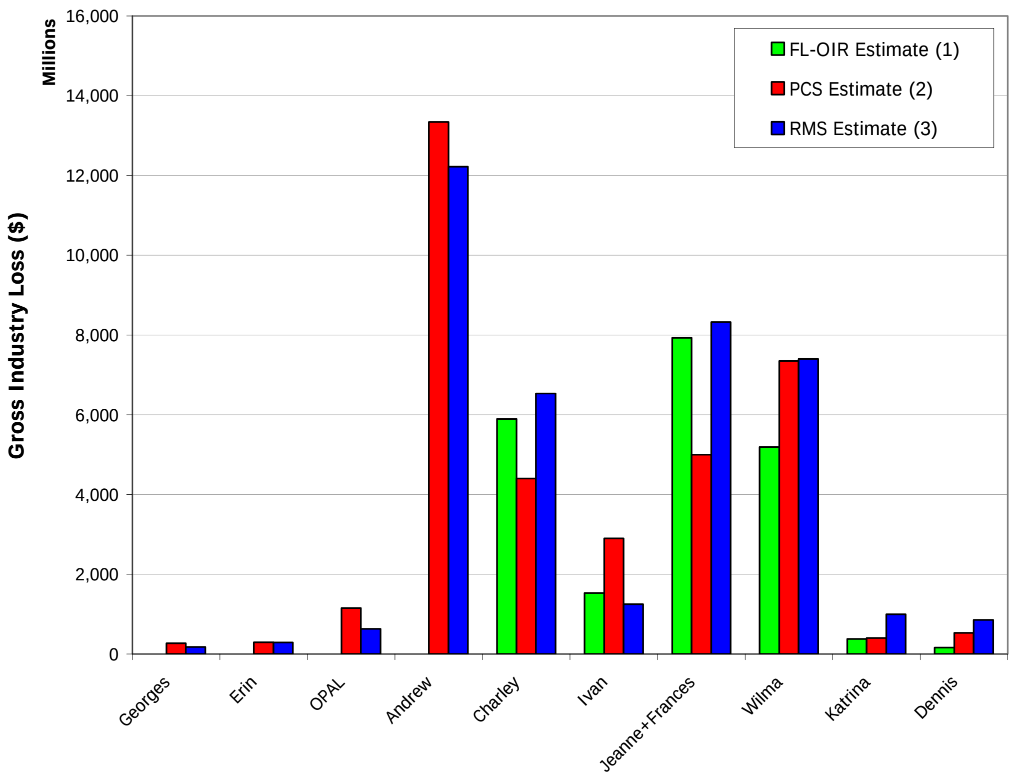
For recent events, on an industry basis. The RMS model is able to reasonably reproduce aggregate incurred industry losses in recent events.

For recent events, on a company-specific basis. The RMS model is able to reasonably reproduce aggregate incurred losses for a diverse set of insurers.

For recent events, on a geographic and demographic basis. The RMS model is able to reasonably reproduce the geographic spread of company specific losses, and the spread of losses between various lines of business and between various types of coverages.

For less recent events, on an industry basis. The RMS model is able to reasonably reproduce industry losses for less recent hurricanes, both in aggregate and on a broad geographic basis, for which some level of industry loss data is available[1].

The two figures below show the results of representative samples of the comparative analyses that have been performed.



Industry Loss Estimates (Residential) for Recent Storms

(1) Estimates from Florida Office of Insurance Regulation report, "Hurricane Summary Data: CY 2004 and CY 2005" from August 2006. Loss represents residential lines and includes demand surge and underreporting estimates and excludes loss adjustment expense.

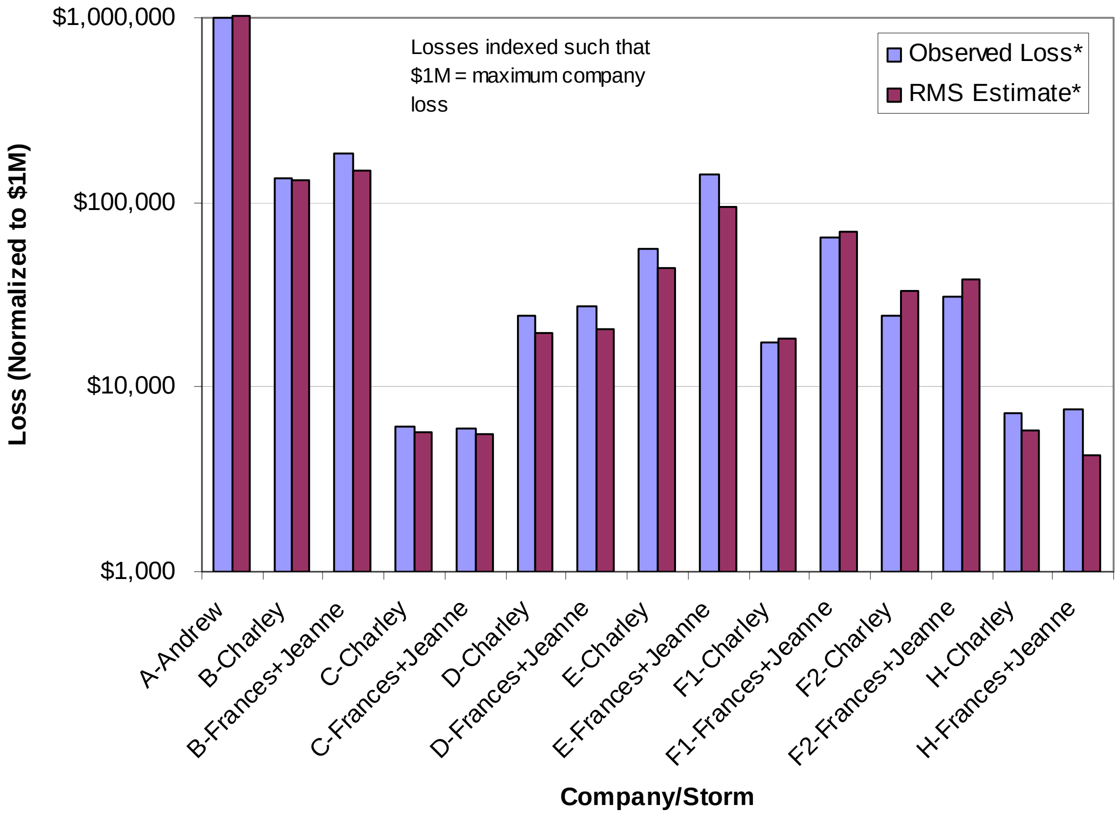
(2) Property Claims Services estimate of residential losses with adjustment to 2003 dollars for Andrew, Erin, and Georges. All others are estimates at time of event. Loss represents residential lines and does include demand surge and excludes loss adjustment expense.

(3) RMS estimates for residential lines and are based on for Georges, Erin, and Andrew are based on Industry Exposure for 2003. All others are based on Industry Exposure for 2005 and 2006 for CY2004 and CY 2005 events respectively. Losses include demand surge and exclude loss adjustment expenses.

---

[1] From 1950 onwards, Property Claims Services (PCS) has tracked the aggregate industry losses from hurricanes. While these estimates, particularly the older ones, are potentially unreliable and must be adjusted to reflect current demographic and economic conditions, these older events do provide a means for checking potential bias in the model.

Industry feedback indicates that Hurricanes Frances and Jeanne have been treated as one event from a claims and adjusting standpoint due to the inability of claims and adjusters to differentiate loss between the two events.



Company Specific Loss Comparisons for Residential (RES) Structure Types

**Loss includes demand surge but does not include loss adjustment expense.*

Insurance companies have supplied RMS with datasets containing the locations and building types associated with coverage and loss amounts. These datasets have been run against historical storms and the computed losses have been compared to the actual losses.

The following table shows a sampling of aggregated loss comparisons by company.

Sample Client Loss Data Comparison
(Losses normalized such that maximum actual loss = $1,000,000)

Comparison	Storm	TIV*	Actual Loss**	Predicted Loss**	Ratio
A	Andrew	16,845,000	1,000,000	1,025,123	1.03
B	Charley	9,094,000	134,205	132,912	0.99
B	Frances+Jeanne	60,718,000	182,634	149,750	0.82
C	Charley	405,000	6,077	5,713	0.94
C	Frances+Jeanne	2,349,000	6,004	5,535	0.92
D	Charley	1,187,000	24,488	19,547	0.80
D	Frances+Jeanne	6,749,000	27,599	20,530	0.74
E	Charley	2,373,000	55,939	44,498	0.80
E	Frances+Jeanne	52,402,000	143,384	94,268	0.66
F1	Charley	2,338,000	17,618	18,096	1.03
F1	Frances+Jeanne	15,606,000	65,176	69,581	1.07
F2	Charley	4,275,000	24,377	33,350	1.37
F2	Frances+Jeanne	20,000,000	31,042	38,400	1.24
H	Charley	671,000	7,216	5,847	0.81
H	Frances+Jeanne	3,734,000	7,509	4,274	0.57

**Abbreviation: Total Insured Value (TIV)*
***Includes demand surge*

Additionally, RMS has calculated losses for all historical storms that have made landfall in the U.S. during the last century. The following table shows a comparison between residential losses as reported by the Property Claims Service (PCS), the Florida Office of Insurance Regulation (FL-OIR), and RMS modeled estimates for significant recent storms. The PCS loss numbers have been adjusted to correspond to 2003 loss numbers to account for increases in inflation.

Comparison of Actual and Estimated Industry Loss ($ million)

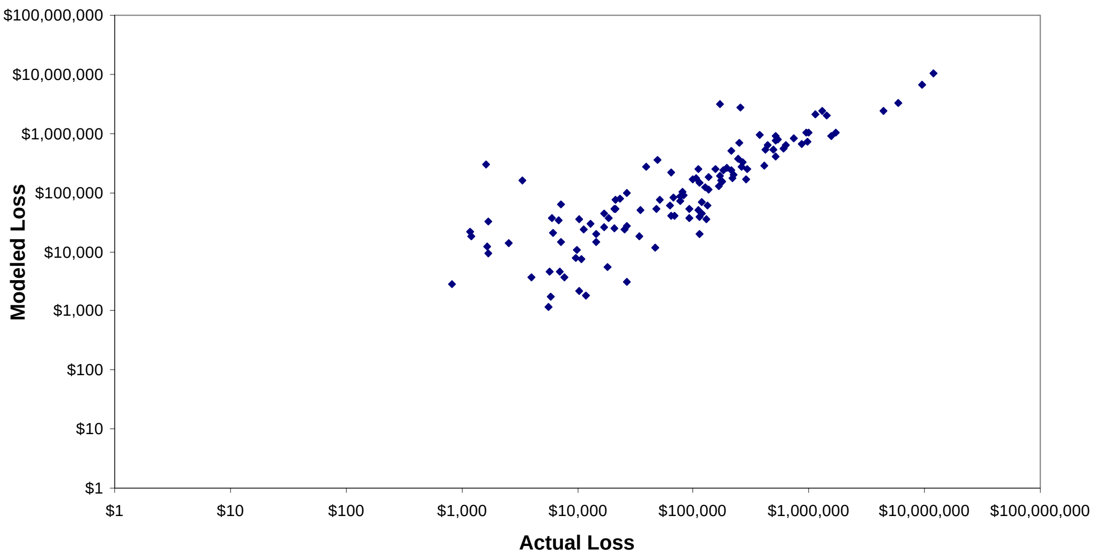
Storm	Year	PCS Estimate	FL-OIR Estimate	RMS Estimate
Andrew	1992	13,341	-	12,222
Erin	1995	297	-	288
Opal	1995	1,154	-	633
Georges	1998	268	-	178
Charley	2004	4,400	5,892	6,531
Ivan	2004	2,900	1,530	1,250
Jeanne+Frances	2004	5,000	7,930	8,326
Wilma	2005	7,350	5,191	7,403
Katrina	2005	400	380	999
Dennis	2005	535	163	857

*See notes on the Industry Loss Estimates (Residential) for Recent Storms figure above.

Following are five validation comparisons of actual exposures and loss to modeled exposures and loss.

Hurricane = Charley
Exposure = Total exposure (modeled and actual losses include demand surge)

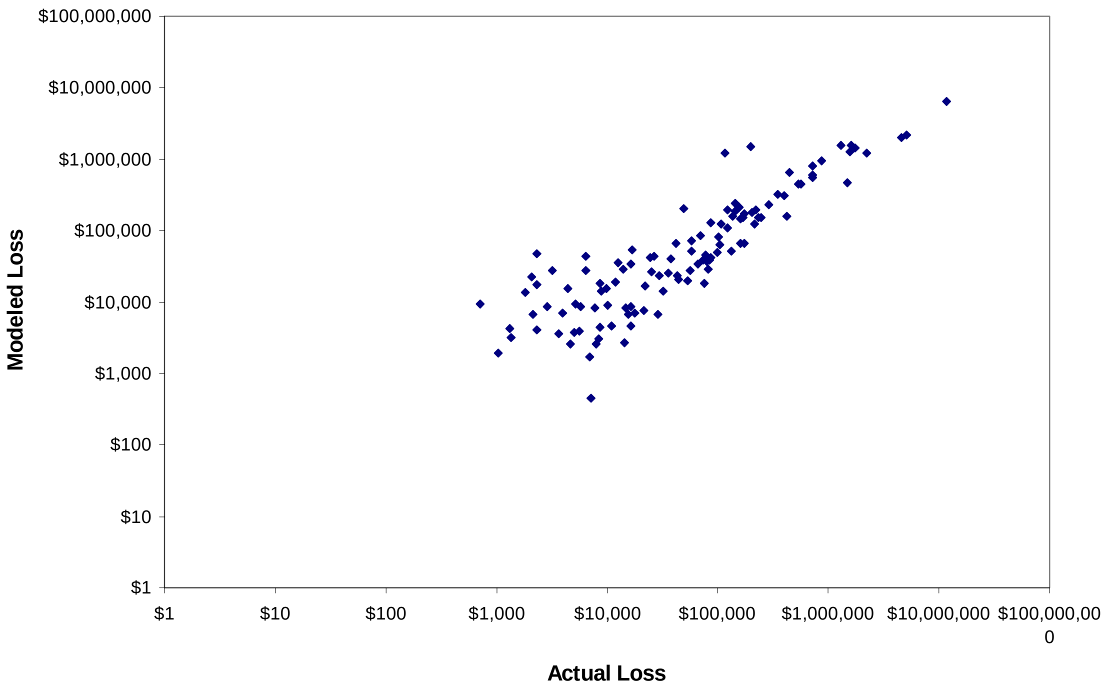
	Company Actual	Modeled	
Line of Insurance	**Loss / Exposure**	**Loss / Exposure**	**Difference**
Manufactured Home	5.99%	6.23%	0.24%



Comparison of a Company's Modeled and Actual Losses by ZIP Code for Hurricane Charley (2004)

Hurricane = Charley
Exposure = Total exposure (modeled and actual losses include demand surge)

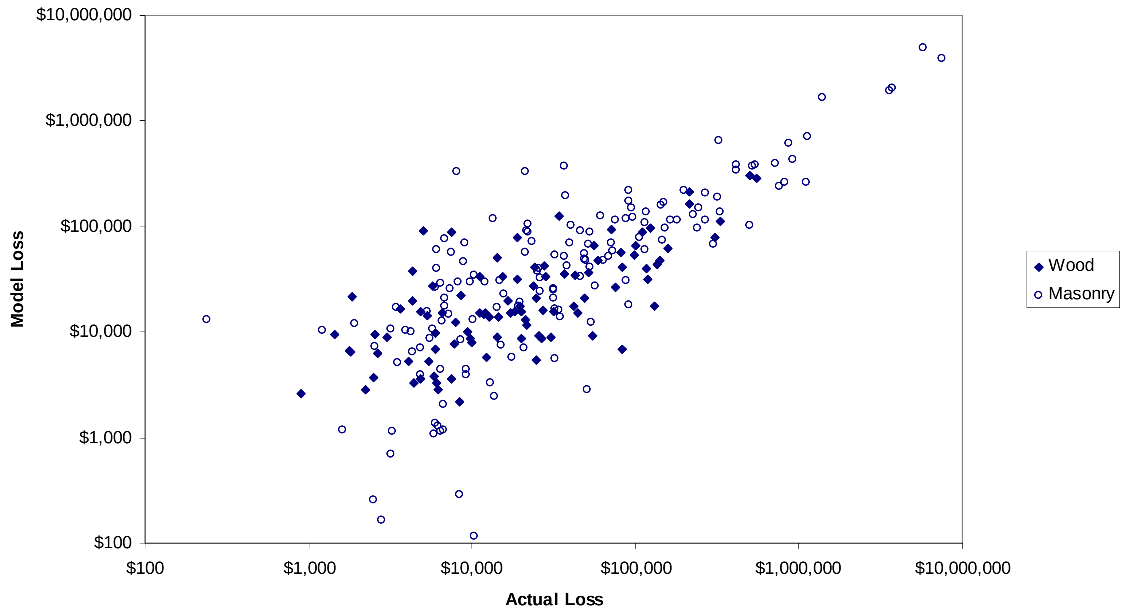
	Company Actual	Modeled	
Line of Insurance	**Loss / Exposure**	**Loss / Exposure**	**Difference**
Manufactured Home	9.33%	8.02%	1.31%



Comparison of a Company's Modeled and Actual Losses by ZIP Code for Hurricane Charley (2004)

Hurricane = Charley
Exposure = Total exposure (modeled and actual losses include demand surge)

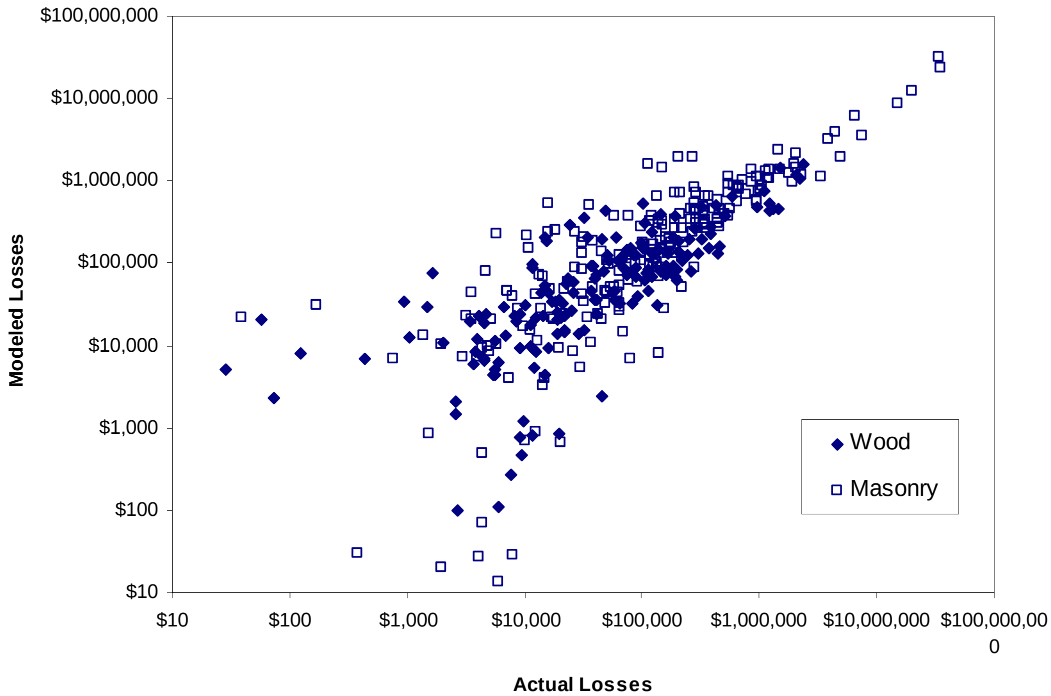
	Company Actual	Modeled	
Construction	**Loss / Exposure**	**Loss / Exposure**	**Difference**
Wood Frame	0.91%	0.71%	0.20%
Masonry	1.59%	1.16%	0.43%
Total	1.46%	1.08%	0.38%



Comparison of a Company's Modeled and Actual Losses by ZIP Code for Hurricane Charley (2004)

Hurricane = Charley
Exposure = Total exposure (modeled and actual losses include demand surge)

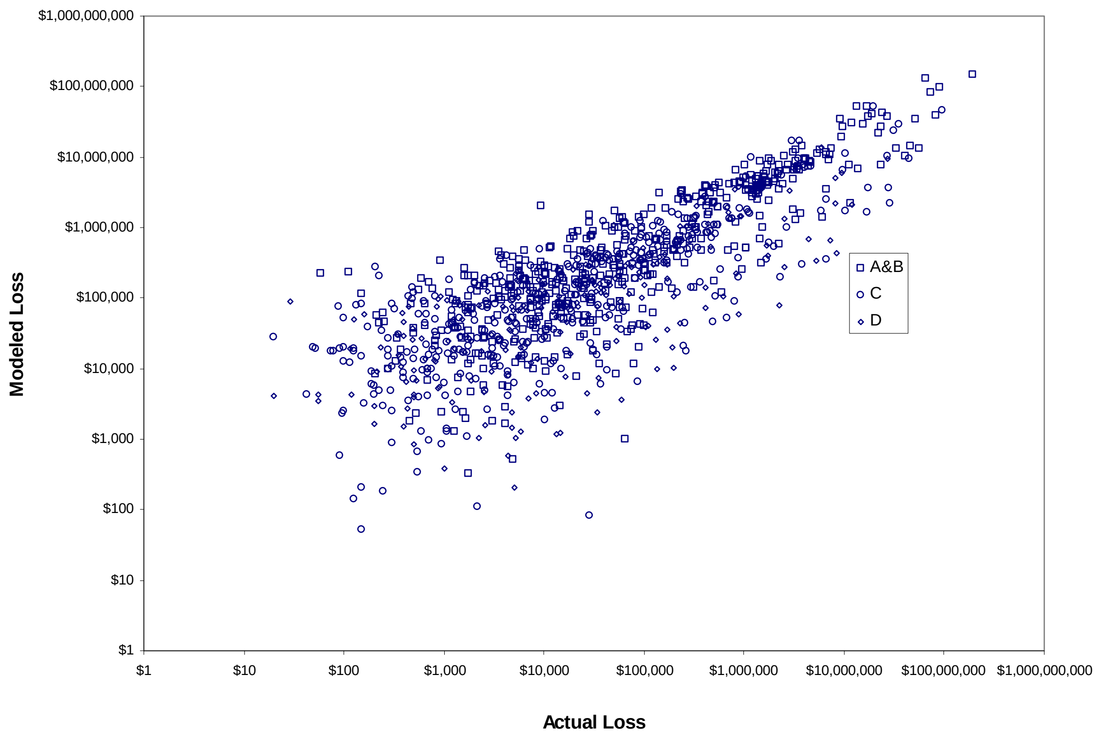
	Company Actual	Modeled	
Event - Company	**Loss / Exposure**	**Loss / Exposure**	**Difference**
Wood Frame	0.97%	0.81%	0.16%
Masonry	0.99%	0.87%	0.13%
Total	0.99%	0.85%	0.14%



Comparison of a Company's Modeled and Actual Losses by ZIP Code for Hurricane Charley (2004)

Hurricane = Andrew
Exposure = Total exposure (modeled and actual losses include demand surge)

	Company Actual	Modeled	
Coverage	**Loss / Exposure**	**Loss / Exposure**	**Difference**
A&B	4.46%	6.05%	1.59%
C	2.87%	2.43%	0.44%
D	2.18%	1.51%	0.67%
Total	3.68%	4.35%	0.67%



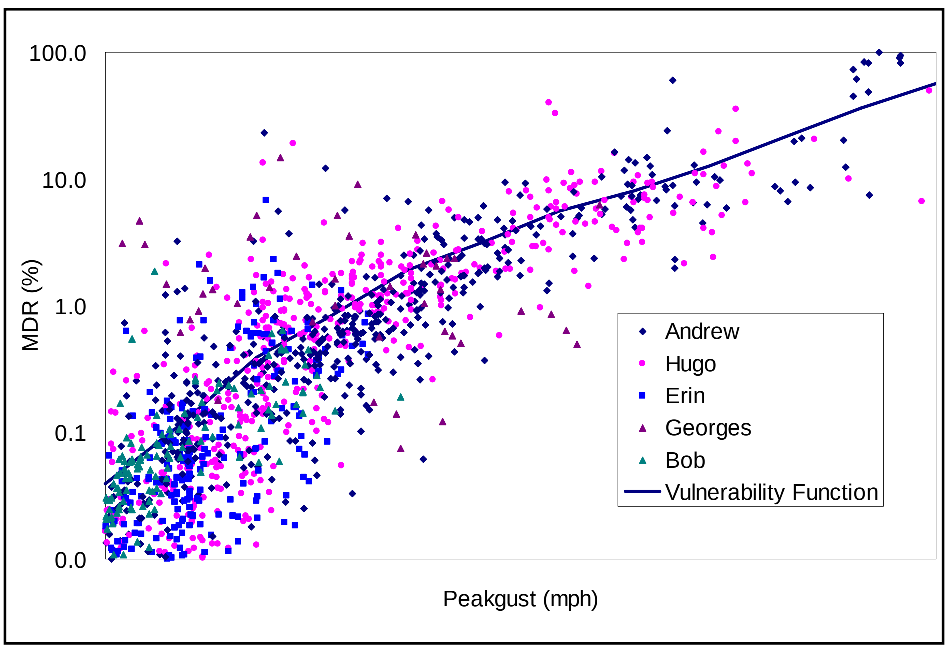
Comparison of a Company's Modeled and Actual Losses by ZIP Code, by Coverage for Hurricane Andrew (1992)

27. Discuss in detail and provide summaries of all validation work that has been performed on the model to confirm that the components of the model are accurate in their roles necessary to project Florida loss costs. This includes damage surveys, detailed claims data collected and analyzed and damage ratios by wind speed and duration of damaging winds among other things.

--*Following answer supplied by Risk Management Solutions, 2008*

RMS has collected loss data from its clients for the purpose of developing and calibrating the model's vulnerability functions. Construction characteristics and insured value information of the associated exposure are supplied directly to us by our clients. This information is assumed to be correct, but is also subjected to checks by RMS.

The datasets vary in resolution and are used for different validation purposes. Data containing detailed information on damage, loss by construction class and exposure by ZIP Code or street address is used for calibration of vulnerability functions. Aggregated data is used primarily for sensitivity analysis. To adequately use loss data for development of vulnerability functions, the data must contain several types of information including: loss per coverage (building, appurtenant structure, contents, additional living expense/business interruption), line of business, exposure value per coverage, description of structures (construction type, etc.), and actual location of structures. RMS has used $4.9 billion of commercial loss data and corresponding exposure data in the development and calibration of damage functions. A sample of the datasets is shown below. A sample of claims data for wood frame structures from five recent hurricanes is also shown below.



Mean Damage Ratio (MDR) versus Peak Gust Wind Speed for Sample Event Claims Data - Wood Frame Construction

With respect to events the current model is built primarily around the experience of 2004 and 2005.For older events the data quality available from insurers was more aggregated than what is available today and is less constructive in updating and refining our catastrophe models.

28. State whether or not the model includes explicit consideration of duration. If so, explain why. If not, explain why not.

---*Following answer supplied by Risk Management Solutions, 2008*

The model does not explicitly consider the duration of wind speed at a particular location over the life of a hurricane. There is a general consensus among experts that for extreme wind conditions generated by hurricanes, damage should be correlated to peak gust. However, RMS vulnerability functions are based on observed losses during hurricanes. These observed losses include a variety of factors, including duration of wind speeds above a certain threshold at which damage occurs due to fatigue under repeated loading, and thus implicitly includes wind duration effects. Peak wind gust is calculated rather than the duration of a sustained wind measurement because of the following:

- It has been historically used to correlate observed damage with hurricane perils.
- It is used in Minimum Design Loads for Buildings and Other Structures, ASCE 7-02 (ASCE, 2002).
  - Full reference: American Society of Civil Engineers - ASCE (2002), "*ASCE 7-02 - Minimum Design Loads for Buildings and Other Structures"*, American Society of Civil Engineers, Reston, VA.Ayscue, J. K. (1996)

29. Provide copies of all independent peer reviews that have been performed of the model (include Bests, Standard and Poors, Moody, etc. as applicable).

---*Following answer supplied by Risk Management Solutions, 2008*

The methodology used in the current hurricane model has evolved over time. The current version of the hurricane model builds upon the strengths of previous versions and many of the current formulations were reviewed by experts in the past.

In addition to the extensive testing that RMS has itself performed on its U.S. Hurricane Model, contributions and model reviews performed by external experts, whose names and reputations rest upon the quality of their work, have contributed to model improvements.

Dr. Nicholas Cook performed a review in 2003. His assessment report and review is focused on the roughness component of the model.

An overall review of the 1997 released version of the U.S. Hurricane Model was conducted in March 1997 by Dr. Robert Sheets, former director of the NHC. Part of this review focused on the methods used to collect meteorological data and on the treatment of inland decay.

ISO, a national industry group, also reviewed the 1997 released version of the RMS U.S. Hurricane Model. ISO elected to utilize RMS technology as the basis for their loss costs filings in hurricane-prone states.

Dr. Robert Simpson and Mr. Glenn Meyers reviewed the original version of the RMS U.S. Hurricane Model. These reviews were performed in late 1993. The reviews were extensive and served to develop criteria that are still used in our model development. Dr. Robert Simpson reviewed the Georgiou wind field formulation that is the basis for the current wind field model. In addition, the following experts were hired by RMS to contribute during key stages of past RMS U.S. Hurricane Model designs and development:

Mr. Charles J. Neumann, a meteorologist who compiled the Atlantic basin storm database (known as HURDAT). Mr. Neumann, who consulted with RMS between 1992 and 2000, conducted a private review and update of the HURDAT database for RMS using knowledge and information that was not available to him or not used at the time at the time of original compilation at the NHC.

Dr. Tim Reinhold, of Clemson University, gave substantial input to the wind field modeling and vulnerability portions of the model in late 1996 that are still relevant.

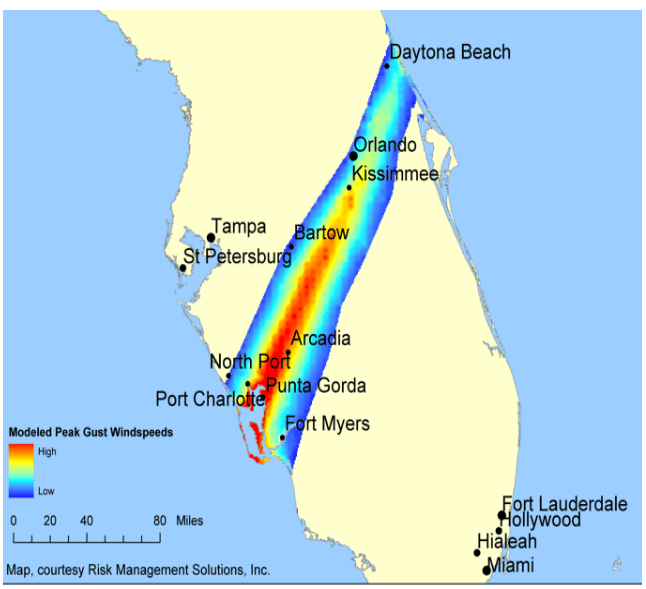
30. Supply copies of all documents and graphical comparisons that support the independence of wind speed and damage models.

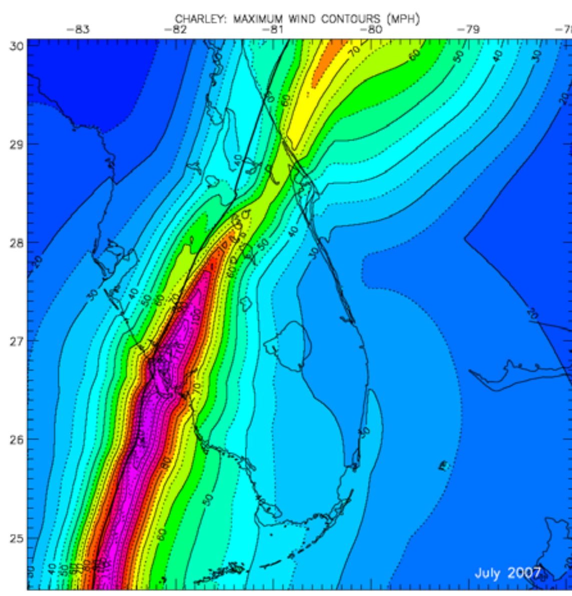
--*Following answer supplied by Risk Management Solutions, 2008*

The wind field calculation within the hurricane model is performed before and calculation of damage to a structure is performed through the vulnerability model. The vulnerability model describes the relationship between a peak gust wind speed, and the damage that will occur to a structure. In calibrating the damage curves in the vulnerability model, the wind speed is assumed to be independent.

The calibration of the wind field (and therefore the wind speed calculation) is performed separate from the vulnerability module, and is based on meteorological principles. The windfield model has performed quite well during the 2004 and 2005 hurricane seasons versus wind observations and thus did not require an update in the most recent release of the hurricane model.

An example of this calculation is provided below, for the wind field footprint of Hurricane Charley, generated post-event for use in post-event loss estimation. This wind field footprint is generated using the H*Wind product, discussed in question 14, at landfall, and then utilizing our windfield model to calculate the inland extent of damaging winds. The wind field footprint generated by the input H*Winds product and the windfield model is then calibrated with wind observations from meteorological wind stations, as well as from field observations of damage to structures that correspond with certain wind speed bands. The full wind field footprint is provided in the figure on the left below displaying the state of Florida. For comparison, the figure on the right below shows the H*WIND version of Hurricane Charley in 2004[2].





2Powell, M. D., S. H. Houston, L. R. Amat, and N Morisseau-Leroy, 1998: The HRD real-time hurricane wind analysis system. *J. Wind Engineer. and Indust. Aerodyn.* 77&78, 53-64

Another perspective of the wind field is to measure the wind field shape at landfall, as displayed on the left above. The shape of the hurricane wind field at landfall is critical as an input to the windfield model in order to properly simulate the impact of surface roughness on inland wind speeds.

31. Provide a complete discussion of the independence of track angle and forward speed.

--*Following answer supplied by Risk Management Solutions, 2008*

In order to respond adequately to the independence of track angle and forward speed, it is necessary to provide a complete description as to the development of the RMS stochastic event set, which is asked for in question 38. Track angle and forward speed are calculated independently through the development of the basin wide stochastic event set. Please refer to question 38 for a full description of the techniques utilized to build the event set, which assume the independence of track angle and forward speed.

32. Provide a complete discussion of the (1) spatial consistency of the reduction factor used to convert between gradient and surface wind speeds and (2) the treatment of uncertainties in this conversion.

--*Following answer supplied by Risk Management Solutions, 2008*

The methodology by which wind speeds at a location are calculated consists of three main steps:

- Estimation of over water gradient balance wind speed Vg
- Estimation of over water wind field at 10 m height V_s
- Estimation of overland 3-sec peak gust

<u>Estimation of over water gradient balance wind speed Vg</u>

The mean gradient wind speed, V_g, is the wind speed at some distance from the ground, approximately one kilometer, where the wind field is not directly affected by the surface roughness of the terrain below. The mean gradient wind speed, V_g, is calculated using the gradient balance equation with Blaton's formula for adjusting the radius of curvature as a result of translation of the storm and the Graham and Hudson (1960) modification of Schloemer's (1954) equation for the pressure field. All the parameters in the equation, such as central pressure, radius to maximum winds, forward velocity, and track location, are known from the lifecycle modeling of the storm track except for one empirical coefficient (obtained by fitting the equation to National Weather Service data on gradient wind speeds).

The equation used to calculate the gradient velocity estimates the sustained (10 minute average) wind speed over water in the upper atmosphere. The calculation accounts for the asymmetry of the wind field in the transitional velocity term. In the northern hemisphere, winds are higher on the right side of the track than on the left as locations on the right side of the track have a positive transitional velocity while those on the left have a negative velocity thus creating the asymmetry in the wind field.

The following contain the meteorological equations utilized to calculate a gradient wind speed (step 1), and convert the gradient wind speed to an over water 10-meter wind speed.

Step 1: Estimate over-water gradient balance wind speed Vg.

The mean gradient wind speed, V_g, is calculated from the formula:

$$V_g = 0.5(V_T Sin(\alpha) - fR) + \left[0.25(V_T Sin(\alpha) - fR)^2 + \left(B \frac{\Delta P}{\rho} \right) \left(\frac{R_{\max}}{R} \right)^B e^{-\left(\frac{R_{\max}}{R} \right)^B} \right]^{\frac{1}{2}} \quad (1)$$

where:

R = radial distance from the storm to the site

α = angle from storm track to site (clockwise is positive)

ΔP = central pressure difference

V_T = storm translational speed

ρ = air density

f = Coriolis parameter (function of latitude)

B = pressure profile coefficient

R_{max} = radius to maximum winds

Step 2: Estimate over-water wind field at 10 meter height V_s.

The 10-minute sustained over-water wind speed, Vs, is a function of the gradient wind speed and the relative position of the site to the storm track and is obtained from:

$$\frac{V_s}{V_g} = a - e^{\left(-b \frac{R}{R_{max}} - c \left(\frac{R_{max}}{2R} \right) \right)} \quad (2)$$

where a, b, and c are constants, calibrated with H*WIND gridded data, that vary between left and right sides of hurricane track.

The calculation of over-water wind field at 10 meter height is described more in the following section.

Estimation of over water wind field at 10 m height V_s

As our interests lie in modeling 10 m surface wind speeds, the gradient wind speed in the upper atmosphere needs to be transformed to wind speed at the surface. This is done using an empirical relationship developed between upper atmosphere winds and surface winds over the water at an elevation of 10 meters (a standard wind speed measuring height.) The form of this relationship is based on the National Weather Service, NWS-23, *Meteorological Criteria for Standard Project Hurricane and Probable Maximum Wind Fields, Gulf and East Coasts of the United States*. The wind profile is a function of the relative position of site to the storm track and three empirical coefficients. RMS has fitted the empirical relation to data from historical hurricanes to obtain wind profile parameters that are region-dependent. These region-dependent wind profiles are used to calculate the over water 10 meter surface wind speeds.

Estimation of overland 3-second peak gust

As the hurricane moves from water to land, wind speeds get reduced because of the increased friction over land resulting from natural barriers such as trees or manmade construction, which offer increased resistance to the flow of the wind. The frictional effects of natural and manmade objects are modeled using a standard wind engineering approach to determine the 3-second peak gust at 10 m elevation. The model calculates overland gust wind speeds at a location by modeling both the effects of the local surface roughness (which is a measure of the resistance offered to the flow of the wind) and any change in the surface roughness conditions upwind of the location being considered. As the upstream roughness generally varies with direction about a particular location, the model considers the effects of upstream roughness by direction. The multi-directional sampling of the roughness makes it possible to model winds at a site, which during the lifecycle of the storm will be blowing from different directions using a time-stepping algorithm.

Land Friction Effects

The starting point for the determination of land friction effects is the creation of a database that describes the surface roughness in terms of the roughness length. The definition of the roughness length arises from the use of a logarithmic velocity, or log-law, profile to describe the variation of the wind speed with height in the region immediately adjacent to the surface. Use of the log-law requires a measure of the underlying surface roughness, which is achieved through the use of the roughness length to parameterize the effect of surface roughness on the wind speed. The use of a roughness length to describe the underlying surface roughness allows a physically based model to be used to calculate both local and upstream surface roughness effects on the wind speed.

The database itself is created using the National Land Cover Data (NLCD) dataset produced by the USGS. This dataset is derived from early to mid-1990's Landsat Thematic Mapper satellite data and provides coverage of the entire continental United States at a horizontal resolution of 30-metres, using a 21-class land cover classification scheme. Further processing of areas classified as urban or suburban in this database is then undertaken by RMS to differentiate areas of differing building heights using U.S. Census housing and population density data and construction square footage. At the same time, those land cover classes whose effects on the surface wind speed are similar are merged into a single land use class. The end result is a 10-class land cover database with land cover classes ranging from water to high-rise buildings. Finally, a representative roughness length is assigned to each of the 10 land cover classes, using published mapping schemes from the scientific literature.

Coefficients describing the impact of land friction are then calculated by using the roughness database in conjunction with GIS software to sample both the local and upstream roughness conditions by direction at each point of interest. Both local and upstream roughness conditions are sampled because the wind speed at a particular location is determined not only by the local surface roughness, but also by any change in the surface roughness conditions upwind of the location being considered. As the upstream roughness will generally vary with direction about a particular location, sampling of the upstream roughness must also be undertaken by direction. Information on the sampled roughness length values and their distance from the location are then used in conjunction with a physically based model to determine an appropriate set of coefficients describing the impact of land friction effects at the location by direction.

There are two ways in which surface roughness alters the wind speeds. Firstly, increased surface roughness reduces the mean wind speed relative to the over-water wind speed. Secondly, the ratio of the peak gust wind speed to the mean wind speed increases, i.e. the greater the surface roughness, the gustier the surface wind becomes. Both effects are quantitatively evaluated using a standard wind engineering approach that together (the product of the two) determine the directional site coefficient which is used to multiply the 10-minute over water wind speed at 10 m to obtain the over land 3-second peak gust at 10 m.

An additional factor that is also considered is the impact of topography on wind speeds. Topography may cause winds to increase or decrease locally (relative to the three-second peak gust calculated in the absence of topography). However, it is not of great significance in the modeling of landfalling hurricanes in the U.S.

The strongest winds at a site may not necessarily occur when the hurricane is at its closest to the site and therefore time-stepping is required so as to calculate the peak gusts at a site during the entire lifecycle of the storm. Therefore, all the calculations starting from the gradient theoretical high elevation wind speed to 3-second direction at a site are calculated along the storm's track at a time interval ranging from 7.5 minutes to 2 hours depending on the forward speed of the storm. The multi-directional upwind roughness effects at a site are required as the winds blowing at a site come from different directions.

At the end of the time-stepping directional wind field calculations the entire time history of the 3-second peak gust at a site is known. This in turn gets passed on to the Vulnerability Module for the determination of damage ratios.

33. Demonstrate why you do or do not believe that "open ocean" track distributions provide reasonable distributions of storm landfall frequency. Demonstrate how you have ensured that the landfall distribution is representative of the historical set. Demonstrate how bypassing storms are generated and treated in the model, including documentation in detail of how the model assures that an event is well defined.

--*Following answer supplied by Risk Management Solutions, 2008*

Storm tracks are simulated using a random-walk technique. This method creates realistic synthetic events covering the entire Atlantic basin, which preserve the statistical behavior of the historical events (mean and variance of translational velocity). The random-walk technique is widely used in the areas of environmental fluid mechanics, particularly to simulate the dispersion of pollutants (e.g., Luhar and Britter 1989). RMS is the first modeling company to apply this methodology to hurricane modeling (Drayton 2000). Each event consists of a track (location, forward speed and direction, central pressure and radius of maximum wind) defined throughout the life of the storm from its genesis to its dissipation.

Tracks are simulated in two steps. First, the tracks are created and second, pressure histories are added to the tracks using a random-walk technique for the pressure. The track model is calibrated across the Atlantic by comparing the rates of storms crossing a grid of cells covering the basin. A more detailed calibration is performed at the coastline by calculating the rate of crossing and probability density functions (pdf) of central pressure and forward speed on linear gates. This methodology is described in detail in the response to question 38. The rest of the answer to this question will focus on how this track set is used to ensure that the landfall distribution is representative of the historical set.

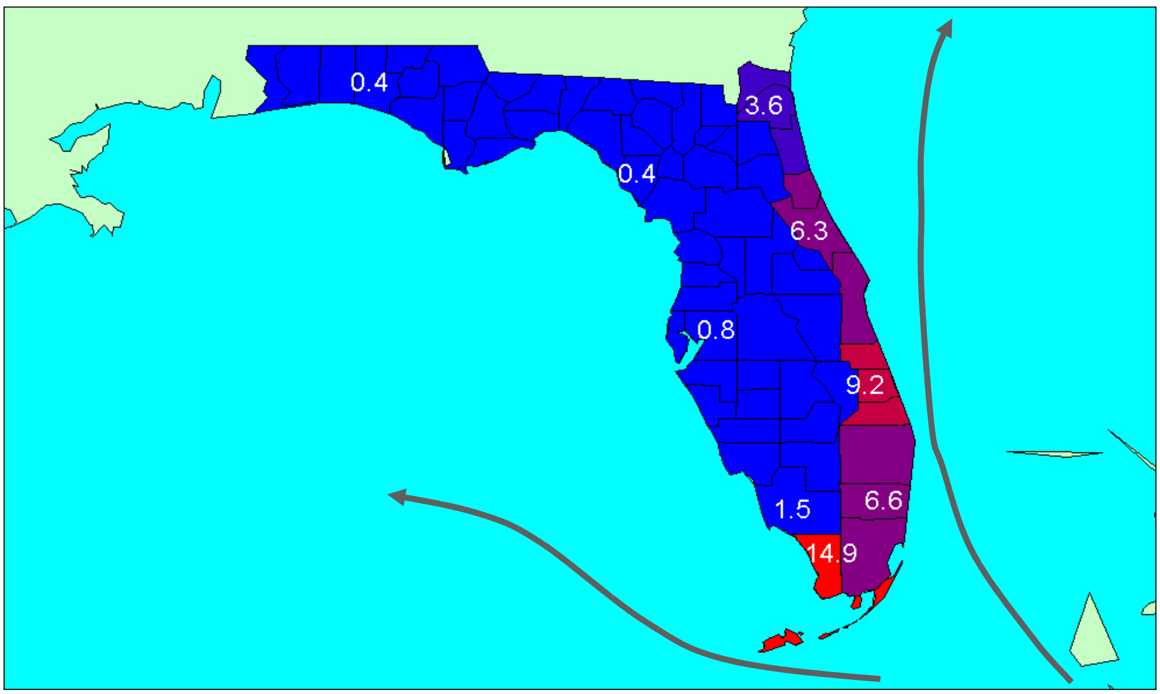
The U.S. coastline is first divided into segments about 50 nautical miles in length. This yields 22 coastal segments (segments 17 to 38) for the state of Florida. There are also four coastal segments to represent the coastline of the neighboring states of Georgia, Alabama, and Mississippi. Historical crossings are determined for each coastal segment by smoothing across extensions to the segments. Probability density functions for central pressure are developed for each segment from landfall data supplemented by nearby, offshore track information. Pressure cumulative distribution functions (cdfs) are then smoothed by normalizing landfall rates by category to match the historical record at a regional level.

Probability density functions of forward speed are developed for groups of coastal segments. Lower and upper bounds are developed for all parameters based on regional hurricane characteristics to keep the parameters within a realistic range.

Calibration of landfall probabilities is performed on a series of segments, approximately 50 nautical miles in length, that bound the entire U.S. coastline. The target historical probabilities are computed from the historical database using a smoothing algorithm that eliminates the spatial patchiness in the limited historical record. The stochastic model is then calibrated to match the historical rates of landfall.

Calibration of forward speeds is performed by computing pdfs of forward speed following the more traditional, general approach set forth in the National Weather Service publication NWS-38 (Ho et al., 1987). Due to the limited length of the historical record, the calibration is performed at a regional level by grouping neighboring gates together.

For bypassing storms, the historical event rates for storms that bypass the Florida Keys and the Atlantic Capes, such as Cape Hatteras and Cape Cod, are calibrated on 'bypassing' gates that capture bypassing storms that do not make U.S. landfall. The calibration of the bypass gates is the same process as a landfall gate, as measured versus the historical record. The impact of bypassing storms on the average annual loss of regions within Florida is shown in the figure below (percentage of total average annual loss caused from bypassing events shown in numbers by region.



34. Do you reset extreme values so as not to be inconsistent with the historical record? If so, which storm parameters are most often affected? How does this impact the uncertainty calculations in the model?

--*Following answer supplied by Risk Management Solutions, 2008*

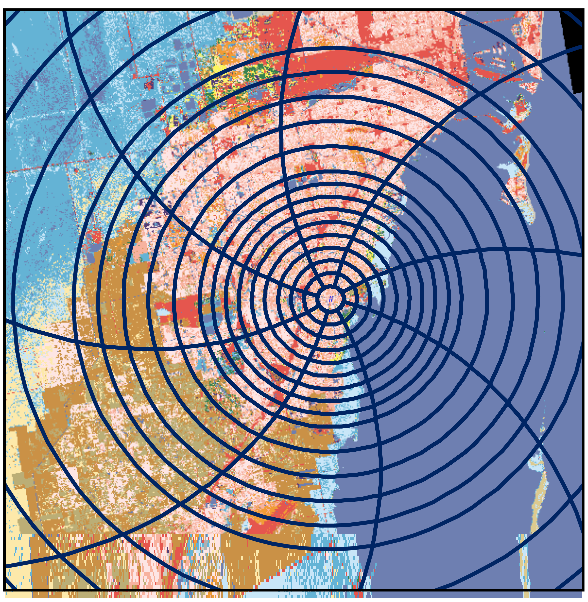
Extreme values of each parameter discussed in previous questions (radius to maximum winds, central pressure, and forward speed) are not reset after the event set generation to be bounded by the historical record. Given the relatively small amount of historical data of 108 years, the stochastic event set demonstrates possibilities that can be simulated with parameter values outside what has been observed in the historical record, and is an important aspect of properly modeling the entire range of possibilities. If a parameter value for a future historical event borders on the range of values for a given parameter in the stochastic event set, then RMS will move quickly to evaluate the need to make changes to the event set, including a full set of statistical tests to ensure the stochastic event set is a satisfactory fit to the historical record.

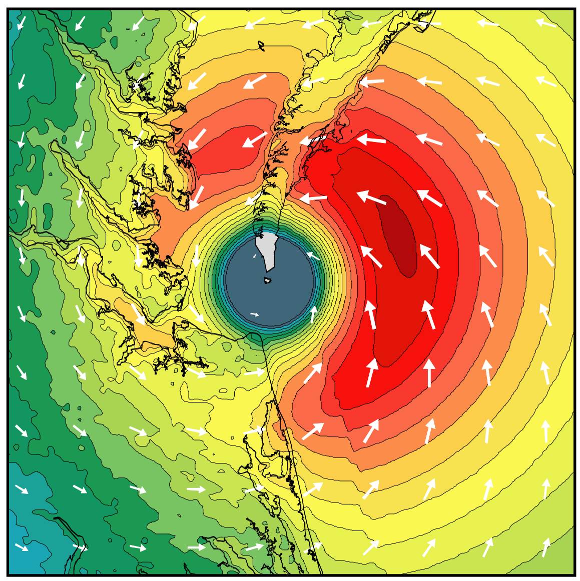
35. Discuss in detail how distance from the coast impacts intensity.

---*Following answer supplied by Risk Management Solutions, 2008*

Distance to coast does not impact intensity of a storm, rather the calculation of wind speed at a given location is performed as discussed in question 32 by use of a time stepping wind field model, which incorporates upwind surface roughness factors in order to determine the final wind speed at a location. This will be answered in question 41.

Therefore, distance to coast is not an explicit variable used within the hurricane model. The graphics below demonstrate how the trajectory of wind moving around a hurricane toward a location of interest is calculated. The first figure shows that eight different quadrants are analyzed for wind speed calculations as a storm moves the location, incorporating varying surface roughness calculations that may exist in different directions upwind from the location. This approach is required due to the fact that the winds rotating counterclockwise around a hurricane do not approach a location directly from the coastline, but rather curve around the hurricane toward the analyzed location. The counterclockwise rotation of winds around the hurricane can be seen in the second figure.





36. Prepare graphical depictions of hurricane characteristics as used in the model.

Describe and justify:

- **a. The data set basis for the fitted distributions.**
- **b. The modeled dependencies among correlated characteristics in the wind field component and how they are represented.**
- **c. Your treatment of the asymmetric nature of hurricanes.**
- **d. The fitting methods used and any smoothing techniques employed.**

---*Following answer supplied by Risk Management Solutions, 2008*

Parts a.) and d.) were answered in question 14.

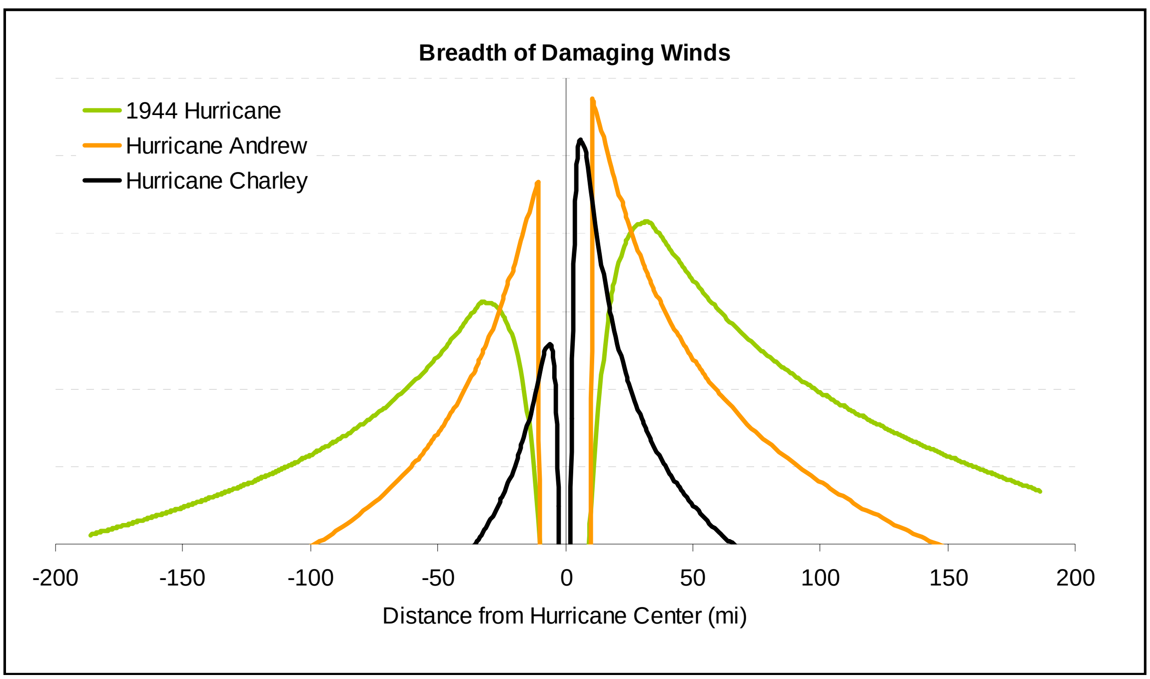
Part b.)

The RMS Hurricane Windfield Model describes the evolution of the wind field as a storm moves from over-water conditions to overland roughness and is consequently calibrated based on both over-water and over-land surface observations described in the H*Wind data-set from the Atlantic Oceanographic and Meteorological Laboratory (AOML) as well as the Extended Best Track data, described above.

The particular form of the equation to calculate the gradient wind used by RMS is that due to Georgiou, which expresses the gradient wind speed at a particular point relative to the centre of the storm as a function of the difference between the central and peripheral pressure of the storm, the forward speed of the storm, the radius to maximum winds, the pressure profile shape parameter, and the distance of the point from the centre of the storm. The calculation of stochastic event gradient wind fields requires the calculation of statistical relationships linking the radius to maximum winds, and the pressure profile shape parameter to the latitude and central pressure of the storm. As mentioned in question 32, the gradient to surface peak gust wind speeds are obtained via a roughness model that accounts for the local and upstream roughness at any given location. Validation of the wind field and the modeled correlated wind field components was performed through an analysis of more than 200 surface wind fields for historical hurricanes as well as historical storm reconstructions where extensive modeled and observed wind speed comparisons were made to assure that the model was internally consistent with reality.

Part c.)

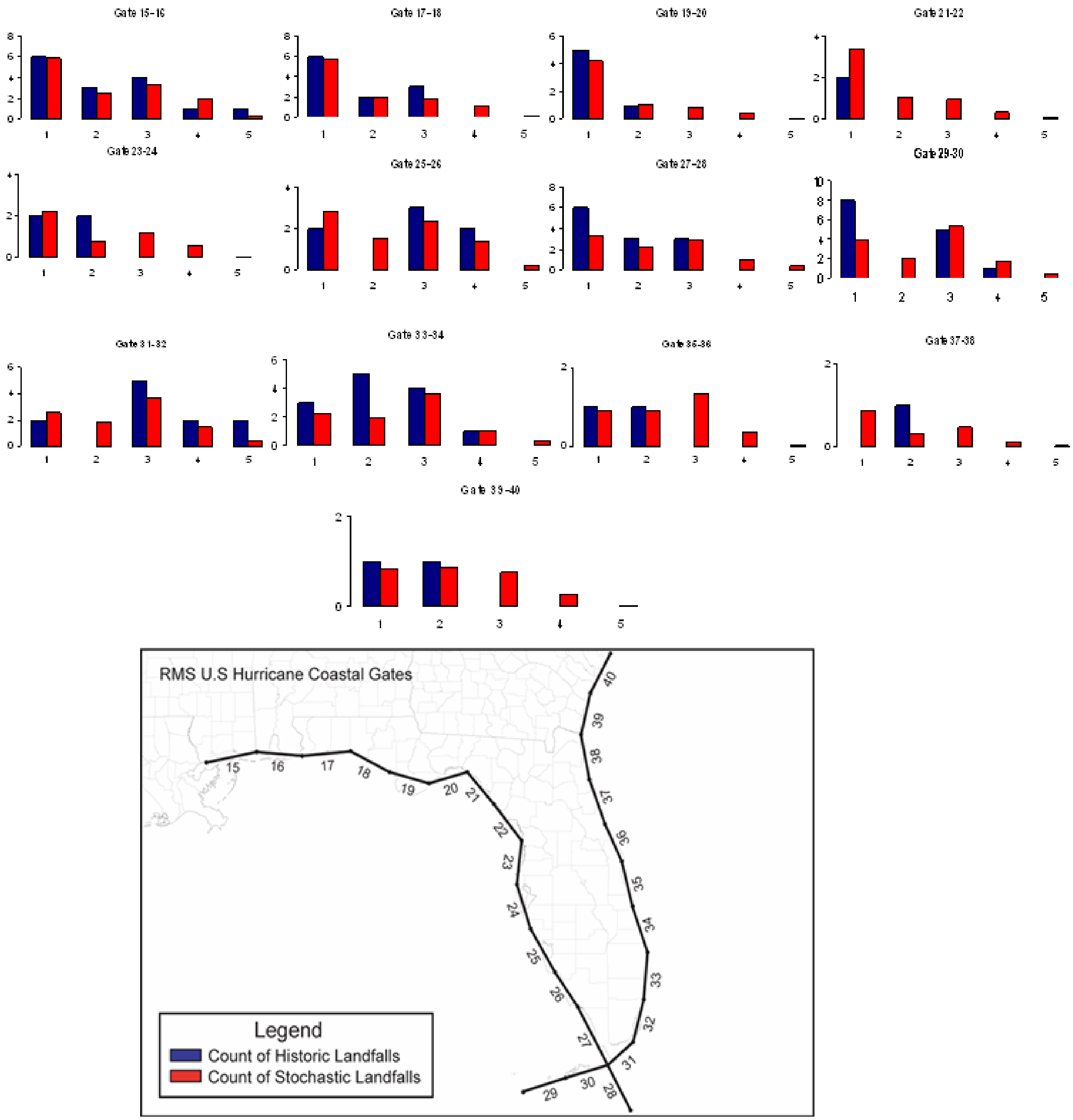
Asymmetries in the hurricane wind field are based on several factors: forward speed of the storm, Rmax and radius of hurricane force winds, as well as an examination of the distribution in asymmetries that are present in the historical record. The stochastic representation of hurricanes in the RMS event set have matched the asymmetries seen in the 2004 and 2005 hurricane events impacting the United States, and particularly Florida. The varying nature of asymmetries due to these components results in a variety of potential wind field shapes at the coastline, as demonstrated in the figure below. The RMS stochastic event set and windfield model take into account the range in asymmetries in the wind field as part of the stochastic event set generation, as discussed in detail in the response to question 38.



37. Provide explanations and documentation that demonstrate that the hurricane intensity at landfall is consistent with the Saffir-Simpson wind range for the stochastic storm set.

---*Following answer supplied by Risk Management Solutions, 2008*

The hurricane intensity at landfall is consistent with the Saffir-Simpson wind range for the stochastic storm set. Please refer to the figure below for the validation of the stochastic event set.



Comparison of Historic and Modeled Multiple Landfall Occurrences by Pair of Adjacent 50 Nautical Mile Gates

The following table represents the historical record of landfall frequency for landfall gate pairs in Florida in tabular format.

Gate pair	Cat1	Cat2	Cat3	Cat4	Cat5
15-16	6	3	4	1	1
17-18	6	2	3	0	0
19-20	5	1	0	0	0
21-22	2	0	0	0	0
23-24	2	2	0	0	0
25-26	2	0	3	2	0
27-28	6	3	3	0	0
29-30	8	0	5	1	0
31-32	2	0	5	2	2
33-34	3	5	4	1	0
35-36	1	1	0	0	0
37-38	0	1	0	0	0
39-40	1	1	0	0	0

The following table represents the RMS view of landfalling hurricane frequency by landfall gate pair, rounded to two decimal places. This chart is the tabular representation of the exhibit shown above in this response.

Gate pair	Cat1	Cat2	Cat3	Cat4	Cat5
15-16	5.87	2.50	3.27	1.91	0.24
17-18	5.75	1.85	1.79	1.04	0.10
19-20	4.19	1.04	0.86	0.43	0.04
21-22	3.39	1.07	0.96	0.32	0.06
23-24	2.21	0.77	1.19	0.57	0.04
25-26	2.84	1.52	2.37	1.37	0.23
27-28	3.33	2.25	2.84	0.98	0.37
29-30	3.93	2.04	5.34	1.78	0.42
31-32	2.55	1.86	3.68	1.47	0.42
33-34	2.27	1.95	3.58	1.03	0.33
35-36	0.90	0.90	1.33	0.36	0.04
37-38	0.86	0.31	0.47	0.11	0.02
39-40	0.83	0.87	0.77	0.28	0.02

38. Describe and support the method of selecting stochastic storm tracks.

---*Following answer supplied by Risk Management Solutions, 2008*

The U.S. stochastic storm set is generated using the RMS basin-wide hurricane methodology first applied to the Caribbean territories. The method generates a realistic set of tracks covering the Atlantic basin with appropriate lifecycles. The lifecycle approach enables the creation of a time-stepping model of the wind field, and the accurate assessment of the possibility of multiple landfalling events and bypassing events. This methodology consists of three main steps:

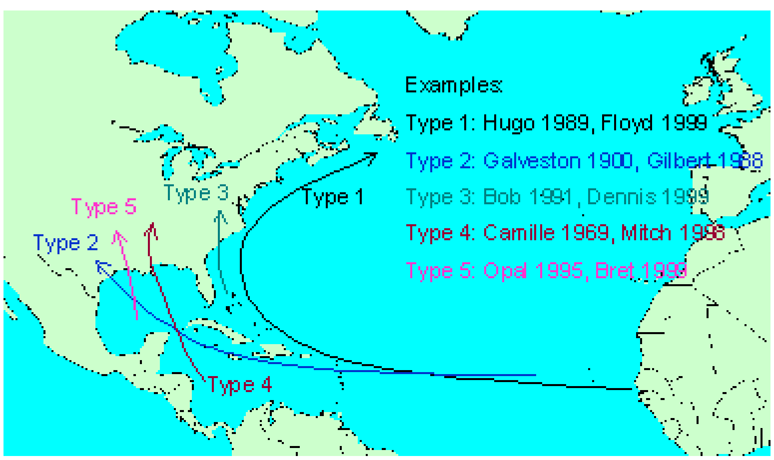
- **Stochastic storm-track generation.** A "Monte Carlo" set of storm tracks (described later), with associated rates of occurrence, is generated using a random-walk technique and calibrated against historical track data.

- **Adding pressure histories to tracks.** This process preserves the large-scale behaviour of intensification and decay associated with the variations in sea-surface temperatures (SSTs) and topography across the basin and calibrates the pressure distributions at all locations of interest within the basin.
- **Importance sampling to obtain a manageable number of hurricanes.** Finally the Monte Carlo storm set is importance-sampled to produce a "boiled down" storm set for loss calculations.

<u>Stochastic Storm-Track Generation</u>

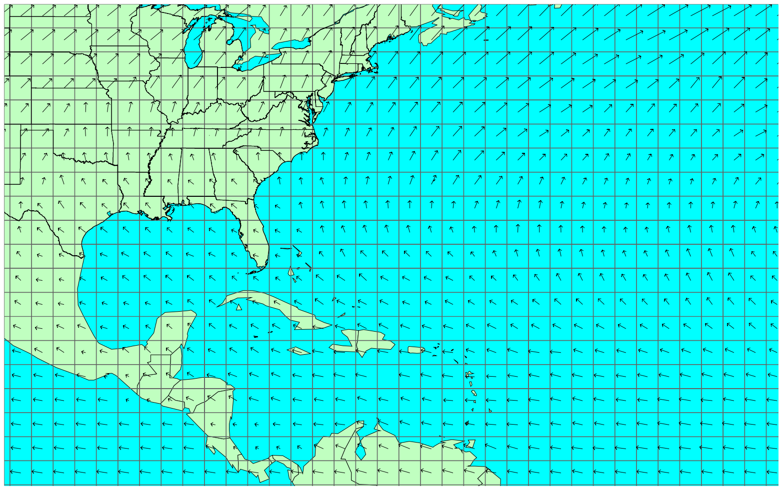
The random-walk track methodology is set up to generate stochastic tracks over the entire Atlantic basin (west of 56° W). The random-walk technique is widely used in the areas of environmental fluid mechanics, particularly to simulate the dispersion of pollutants (e.g., Luhar and Britter 1989). RMS is the first modeling company to apply this methodology to hurricane modeling (Drayton 2000). To facilitate the importance sampling process, RMS has classified tracks into five broad types (shown in the figure below) based on where the storms form and where they go:

- **Type 1 and 2 storms** form in the deep tropics and move westwards across the Atlantic. Type 1 storms (e.g., Hurricane Floyd 1999) recurve up the East Coast while Type 2 storms (e.g., Hurricane Andew 1992, Galveston Hurricane 1900) are steered westwards toward the Gulf of Mexico.
- **Type 3 storms** form off the East Coast of the U.S. They tend to be weaker at landfall than types 1 and 2 as they have spent less time over the very warm tropical waters and tend to be less well organized in structure (e.g., Hurricane Bob 1991).
- **Type 4 storms** form in the Caribbean Sea and tend to track generally toward the north toward Florida and into the Gulf of Mexico . These storms can be very intense (e.g., Hurricane Camille 1969).
- **Type 5 storms** form in the Gulf of Mexico. The waters in this region are very warm so these storms can intensify rapidly (e.g., Hurricane Opal 1995) but tend to make landfall within a few days of forming. Typically, however, they do not develop the well organised structure of types 1, 2 and 4.



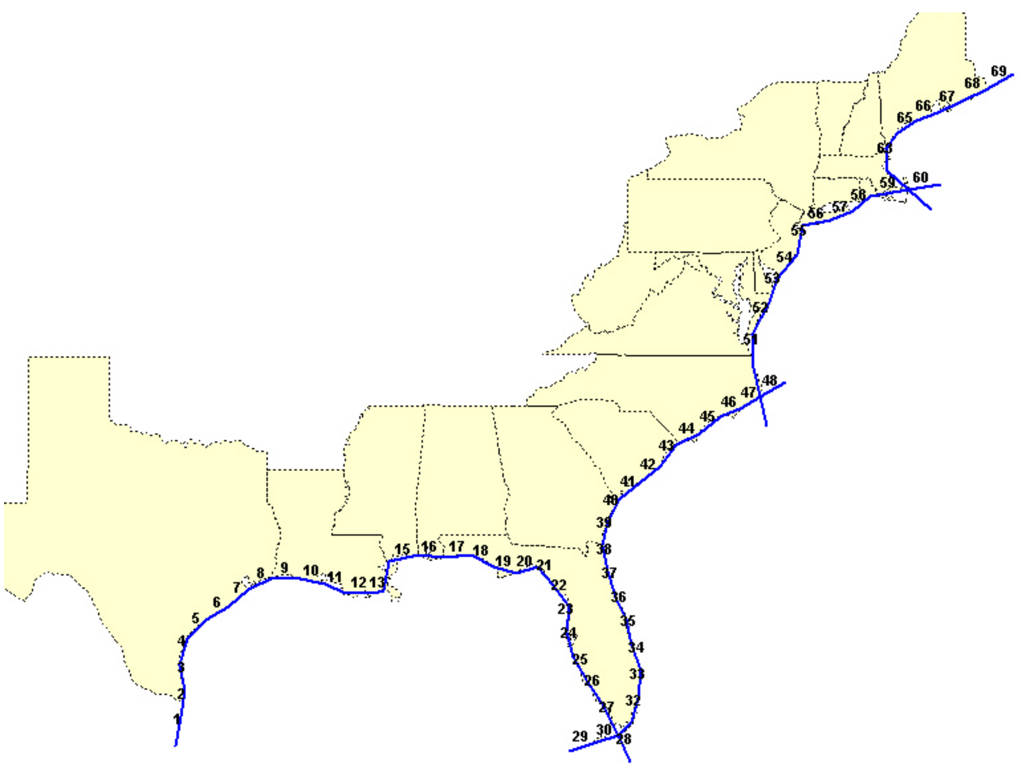
Classification of North Atlantic Hurricane Tracks into "Types"

The random-walk methodology simulates the five types separately. Historical tracks are analyzed to provide the necessary input parameters for the model, which are the mean and variances of translational velocity in each 2 × 2 degree cell in the simulation area. The figure below shows the mean translational velocities obtained from analysis of Type 2 hurricanes. The direction depicts the mean direction and the length of the arrow is a measure of the mean speed of Type 2 hurricanes as they cross each 2 × 2 degree cell. The random-walk model simulates tracks that collectively preserve the mean behavior of each storm type but individually exhibit variations about the mean. Each stochastic track is unique and different from any historical track, but the variation within the stochastic track set is consistent with the range of behavior seen in the historical record.



Mean Translational Velocities for 'Type 2' Hurricanes on a 2º x 2º Grid

The random-walk model is calibrated across the basin so that the rates of storms crossing each 2×2 degree cell near land are consistent with the historical crossing rates smoothed over a number of neighboring cells. At the U.S. coast, a more detailed calibration is performed. U.S. landfall rates are calibrated against history on a series of approximately 50 nautical mile gates running along the U.S. coast. Rates for storms that bypass the Florida Keys and the Atlantic Capes, such as Cape Hatteras and Cape Cod, are calibrated on gates extending offshore. The sixty-nine gates used in calibration of the U.S. Hurricane Model are shown in the figure below.



Landfalling Gates Used to Calibrate Stochastic Storms Against Historical Database

Adding Pressure Histories to Tracks

Once the stochastic track set has been generated, pressure histories are added to the tracks using a second random-walk technique while the storms are over the ocean. The mean and variance of the rate of change of pressure across the simulation area are quantified from historical data. These parameters reflect tendencies for pressures to fall over warm sea-surface temperatures (SSTs) and rise over cold SSTs. The longer a storm remains over cold water the more likely it is to weaken. As a result, intense storms making landfall in the Northeast tend to be traveling rapidly as they move northward over the cooler SSTs. The random-walk method preserves mean changes in pressure while producing variation about that mean. The lower limit of the central pressure, called the minimum sustainable pressure, depends on the SSTs around the storm.

Pressures at key locations are calibrated against history by specifying the pressure probability distribution that storms should satisfy in that area. Pressures along each track are adjusted up or down, preserving their large-scale behavior, such that the pressure probability distribution of the entire event set matches the target distribution at each location.

When storms make landfall on the U.S., they weaken as they are cut off from the warm waters that fuel them, and their pressures subsequently rise. The over-land filling rates vary between storms. Should a storm exit back over the ocean, the random-walk pressure model takes over again and allows for the possibility of intensification before it makes a subsequent landfall.

At this point the tracks of the stochastic storms and their pressure time histories during their entire lifecycles are known and thus a more detailed calibration against history at the U.S. coast can be performed. The calibration tests that are performed are for the landfall rates, total and by category, pressure distributions and forward speed distributions. All the parameters are determined at the landfalling gates shown in the figure above for historical and stochastic storms as the storms cross the gates. Lower and upper bounds are developed for all parameters based on the analysis of historical storms and the corresponding stochastic parameters are tested to ensure that they lie within these bounds.

Importance Sampling ("Boiling Down")

The random-walk simulation is a Monte Carlo process. A total of 400,000 tracks are generated, equivalent to 100,000 years of simulated time. As it is not practical to run loss calculations with this number of tracks, the Monte Carlo event sets are importance sampled. Tracks with similar paths and intensities at key locations (landfall or bypassing) are identified and grouped together. Most of the tracks are discarded and their rates are passed to the small number of tracks that are retained. Importance sampling is achieved by retaining a greater proportion of the intense events than weaker events. Loss convergence, as well as file sizes and run time issues, were all considered when determining the final number of events retained in the event set. The boiled down event set represents the final set of stochastic storms, which is then passed on to the wind field module to compute wind speeds.

Before actually passing on the boiled down stochastic storm set to the wind field module, calibration tests are re-run to ensure that the landfalling parameters of the boiled down stochastic storm set lie within the bounds established from the analyses of historical storms.

39. Describe and support the method of selecting storm track strike intervals. If strike locations are on a discrete set, show the landfall points for major metropolitan areas in Florida.

--*Following answer supplied by Risk Management Solutions, 2008*

This question has been addressed in question 37. To supplement this, we provide the following chart, which lists the latitude/longitude coordinates of each gate impacting Florida.

Gate Number	Start X	End X	Start Y	End Y	Length (mi)
15	-89.46	-88.38	30.18	30.37	65.77
16	-88.38	-87.40	30.37	30.30	58.64
17	-87.40	-86.37	30.3	30.38	61.67
18	-86.37	-85.54	30.38	30.01	55.77
19	-85.54	-84.70	30.01	29.81	52.17
20	-84.70	-83.88	29.81	30.01	51.02
21	-83.88	-83.31	30.01	29.44	52.16
22	-83.31	-82.72	29.44	28.79	57.32
23	-82.72	-82.82	28.79	28.01	54.23
24	-82.82	-82.53	28.01	27.22	57.4
25	-82.53	-82.01	27.22	26.45	62.11
26	-82.01	-81.52	26.45	25.83	52.52
27	-81.52	-80.88	25.83	24.79	82.23
28	-80.88	-80.40	24.79	23.99	62.53
29	-82.68	-81.78	24.32	24.56	58.99
30	-81.78	-80.88	24.56	24.79	58.7
31	-80.88	-80.34	24.79	25.20	44.11
32	-80.34	-80.11	25.20	25.96	54.43
33	-80.11	-80.03	25.96	26.80	58.25
34	-80.03	-80.35	26.80	27.61	59.32
35	-80.35	-80.58	27.61	28.42	57.7
36	-80.58	-80.94	28.42	29.09	51.17
37	-80.94	-81.27	29.09	29.88	58.08
38	-81.27	-81.45	29.88	30.67	55.63
39	-81.45	-81.25	30.67	31.42	53.16
40	-81.25	-80.83	31.42	32.11	53.68

40. Besides those variables identified in the M-5 disclosures (Meteorological Standard Number 5 of the Florida Commission on Hurricane Loss Projection Methodology), identify other variables in the model that affect over land wind speed estimation.

--*Following answer supplied by Risk Management Solutions, 2008*

No other variables for model degradation rate were used other than those specified in Standard M-5.

41. Describe the representation of land friction effects in the model. Describe the variation in decay rate over land used in the model. Provide maps depicting land friction effects.

--*Following answer supplied by Risk Management Solutions, 2008*

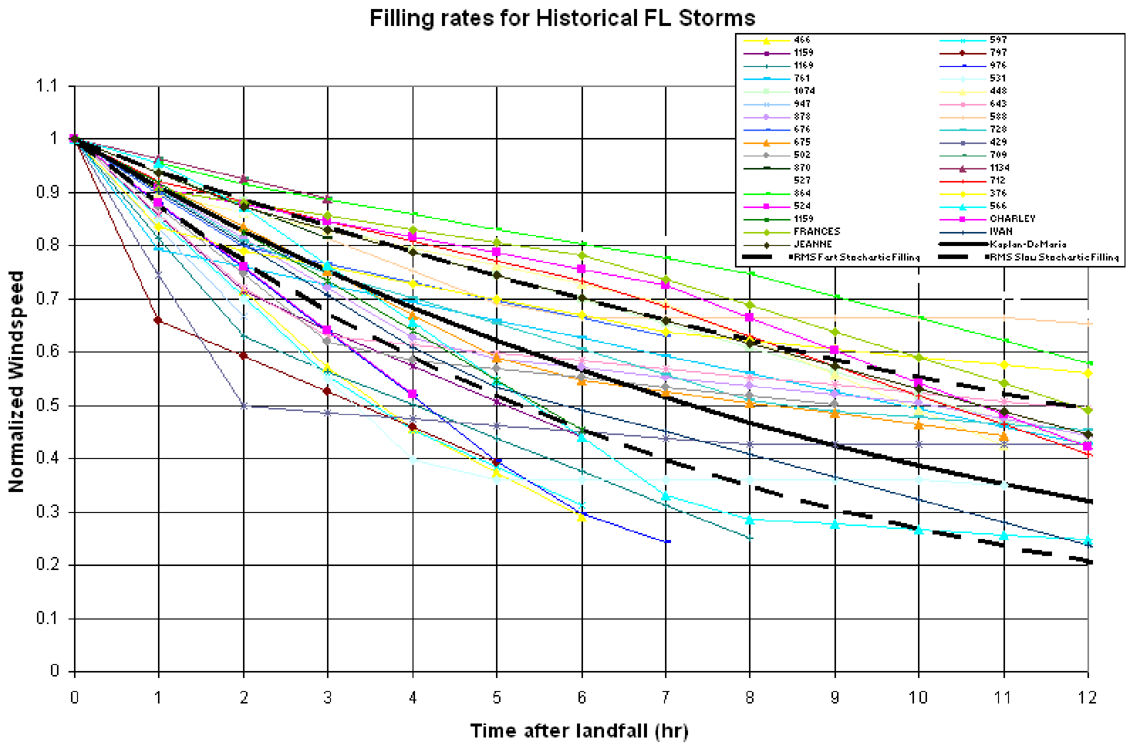
The model calculates over land peak gust wind speeds at a location by modeling both the effects of the local surface roughness and any change in the surface roughness conditions upwind of the location being considered. The treatment of both surface roughness effects on mean and gust wind speed changes are modeled based on peer-reviewed wind engineering literature (Cook, 1985; Wieranga, 1993 and 2001)

The starting point for the determination of land friction effects is the creation of a database that describes the surface roughness in terms of the roughness length. The definition of the roughness length arises from the use of a logarithmic velocity, or log-law, profile to describe the variation of the wind speed with height in the region immediately adjacent to the surface. Use of the log-law requires a measure of the underlying surface roughness, which is achieved through the use of the roughness length to parameterize the effect of surface roughness on the wind speed. The use of a roughness length also allows a physically based model to be used to calculate both local and upstream surface-roughness effects on the wind speed. The database itself is created using the National Land Cover Data (NLCD) dataset produced by the USGS (http://landcover.usgs.gov/usgslandcover.php). This dataset is derived from early to mid-1990s Landsat Thematic Mapper satellite data and provides coverage of the entire continental U.S. at a horizontal resolution of 30 meters, using a 21-class land-cover classification scheme. This dataset has been supplemented by ASTER (Advanced Spaceborne Thermal Emission and Reflection Radiometer) satellite imagery to ensure the land use classification is timely with respect to current conditions in Florida. RMS then undertakes further processing of areas classified as urban or suburban in this database in order to differentiate areas of differing building heights. This is done primarily using data on the construction square footage by ZIP Code. At the same time, those land-cover classes whose effects on the surface wind speed are similar are merged into a single land-use class. The end result is a 10-class land-cover database with land-cover classes ranging from water to high-rise buildings. Finally, a representative roughness length is assigned to each of the 10 land-cover classes, using published mapping schemes from the scientific literature. The approaches used to develop roughness lengths have been independently reviewed by Dr. Nicholas Cook and Dr. Craig Miller.

Coefficients describing the impact of land friction are then calculated by using the roughness database in conjunction with GIS software to sample both the local and upstream-roughness conditions by direction at each point of interest. As the upstream roughness will generally vary with direction about a particular location, sampling of the upstream roughness must also be undertaken by direction. Information on the sampled roughness length values and their distance from the location are then used in conjunction with a physically based model to determine an appropriate set of coefficients describing the impact of land friction effects at the location by direction.

The wind speed decay for each storm follows the functional form of the Kaplan and DeMaria (1995) model. For a given storm, the decay rate of wind speed is fixed once landfall occurs but varies from one landfall to another, allowing the stochastic (simulated) storms to reflect the significant variation in the filling behavior of the historical storms. Decay rates are assumed to have a Gaussian distribution with a mean as given by the Kaplan and DeMaria model and a coefficient of variation of 38% and truncated at one standard deviation.

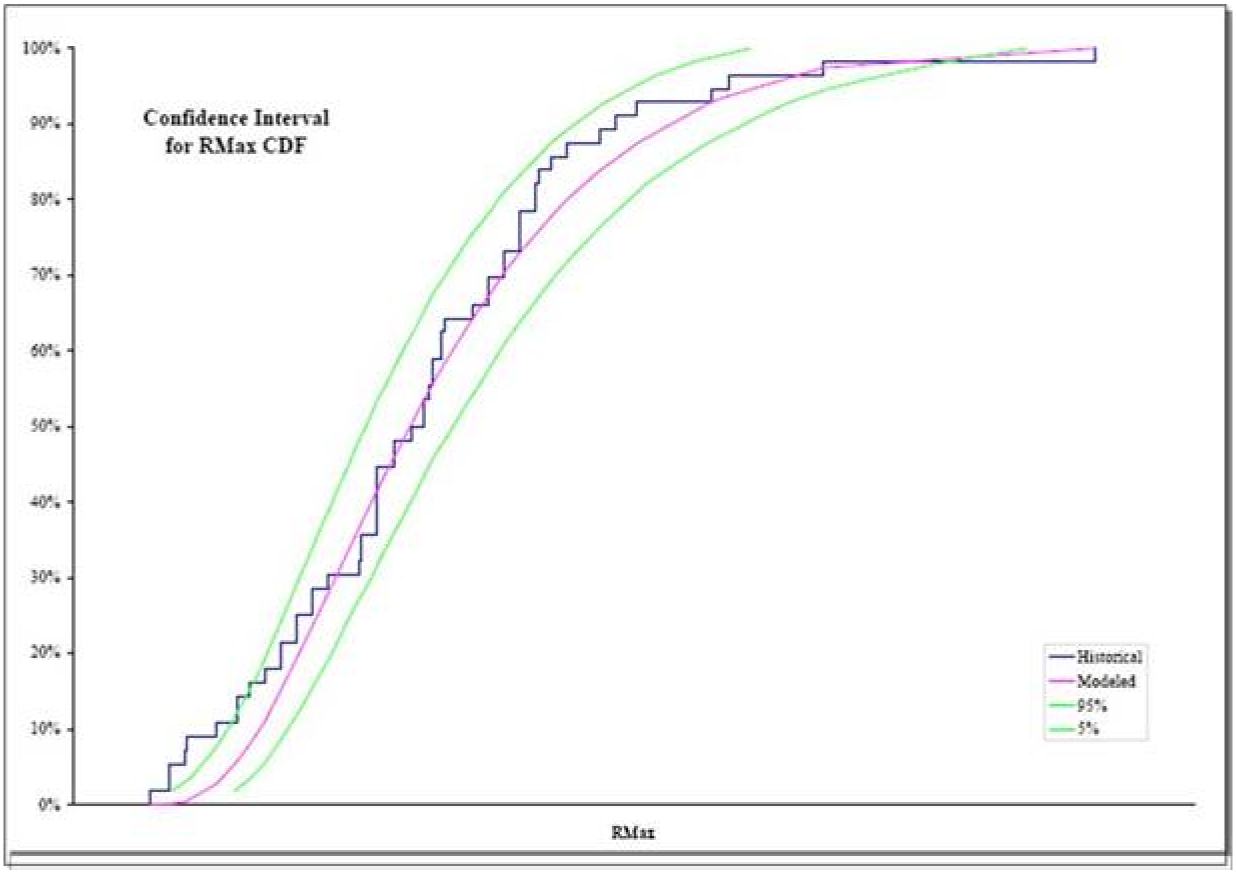
Additionally, the figure below illustrates a comparison of the normalized wind speeds for historical Florida landfalling storms compared with the RMS stochastic model's fastest and slowest filling rates as well as the Kaplan-DeMaria filling rate. The decay rates for the four Florida landfalling storms (Charley, Frances, Ivan and Jeanne) of 2004 have been enumerated as well.



42. Justify the relationships between central pressure and both radius of maximum winds and radius of hurricane force winds.

---*Following answer supplied by Risk Management Solutions, 2008*

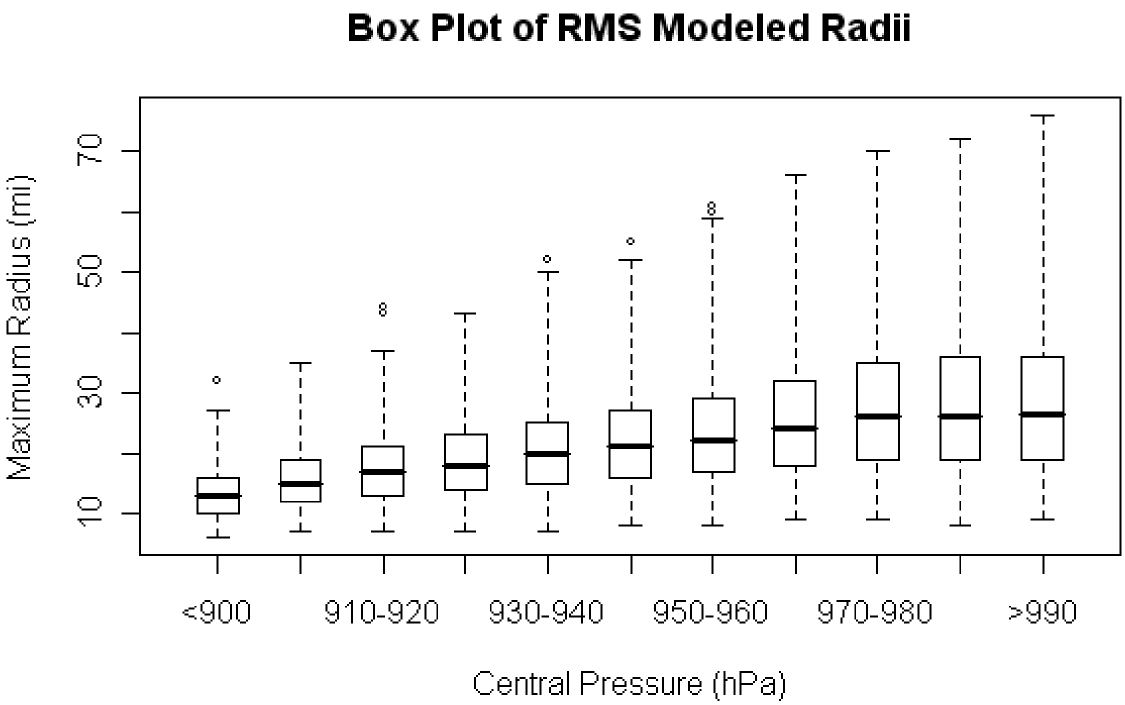
The Radius to Maximum Wind distribution used in the RMS model compares well to history as seen in the figure below. The p-values for these tests showed a reasonable agreement with the historical data. The data used for the radius to maximum wind relationship consists of a combination of Extended Best Track data (Mark DeMaria) from 1988-2000, the H*Wind data from 2000-2005 and also data from NWS 23 & 38. The following graph shows the distribution of radius to maximum winds for the Florida event set, along with the historical verification of storms from the 2004 and 2005 hurricane seasons.



The figure above illustrates the cumulative frequency distribution as well as 5 and 95 percentile overlays for the RMS hurricane modeled radius to maximum wind speed variable.

The dependency of Rmax with respect to pressure is shown in the box-plot below. This shows that as storms intensify, they tend to have smaller Rmax and less variance. Besides pressure, Rmax is also dependent on latitude, with the mean Rmax for a given central pressure being larger as a storm moves north. For example, the mean modeled Rmax value varies by 5 miles for a pressure of 920 mb depending on where you are in Florida. This range increases to 7 miles for modeled hurricanes with a central pressure of 980 hPa. The ranges provided in the table below include the variation in Rmax with latitude.

The estimated radii provided in the table also take into consideration the range of translational velocities in the model. The estimates shown are calculated from the RMS windfield formulation. There are no minimum radius values because the RMS model contains effectively a solid eye. Any point with R/RMax < 1 is assigned the wind speed at R = RMax, the same distance from the track, since any point inside the eye must have previous felt the maximum winds of the eyewall. This means that at some distance from the center of the storm, the wind speeds along the same direction but closer to the center will be greater than or equal to the wind speed at that point.



Central Pressure (mb)	Range of Rmax (mi)	Range of R (>110 mph) (mi)	Range of R (>73 mph) (mi)	Range of R (>40 mph) (mi)
900	6-26	< 90	< 195	< 370
910	6-32	< 95	< 205	< 395
920	7-41	< 110	< 225	< 435
930	7-40	< 100	< 220	< 425
940	8-53	< 105	< 235	< 455
950	8-54	< 100	< 230	< 450
960	9-62	< 85	< 210	< 425
970	9-68	< 15	< 175	< 390
980	9-71	NA	< 135	< 340
990	10-73	NA	< 95	< 275

43. Does your model generally underestimate losses for low wind speeds and overestimate losses for high wind speeds? If it does, explain how this can be acceptable. If you assert that it does not, supply convincing evidence of the independence of wind speed and the accuracy of damage estimates.

--*Following answer supplied by Risk Management Solutions, 2008*

The RMS Hurricane Model does not have the characteristic described in the question of under predicting low wind speed losses and over predicting high wind speed losses. This is due in large part to the vast amount of low wind speed claims and exposure data provided by insurers relative to the hurricanes of 2004, which were in large part low wind speed events. We also obtained an appreciable amount of high wind speed data via hurricane Charley losses in Charlotte County.

Evidence of the behavior of the model is illustrated in various figures plotting claims data and damage functions included in this document.

44. Provide a listing of any papers, reports, and studies used in the development of the vulnerability functions.

--*Following answer supplied by Risk Management Solutions, 2008*

The vulnerability functions are developed on the basis of structural and wind engineering principles coupled with analyses of historical storm loss data, building codes and published studies.

The RMS Component Vulnerability Model is based on the methodology outlined by Professors Dale Perry and Norris Stubbs of Texas A&M University (Stubbs et al., 1995). This methodology has been augmented by internal research by RMS staff, and has been published by RMS staff (Khanduri, 2003).

References used by RMS for developing the vulnerability functions include:

- studies performed for the National Science Foundation (J.H. Wiggins Company, 1980; NBS, 1981) and for the Veterans Administration (Texas Tech. University, 1978)
- studies completed by the Army Corps of Engineers, FEMA and NOAA (USACE, 1990), the National Research Council (NRC, 1993), the Building Research Establishment in England (Cook, 1985), and Don Friedman at the Travelers (Friedman, 1987).

Other pertinent references include Davenport et al. (1989), Hart (1976), Liu et. al. (1989), McDonald (1986, 1990), Mehta (1983, 1992), Minor (1979), Sparks (1988, 1990, 1993), Stubbs (1993), and Zollo (1993).

RMS has used historical storm loss data and research from the 2004/2005 storm seasons as well as the work from Sparks and Bhinderwal (1993) from Clemson University, and Don Friedman at Travelers (Friedman 1987) in calibration of the vulnerability functions, as well as other loss data obtained from RMS clients.

45. Justify the construction types and characteristics used, and provide validation of the range and direction of the variations in damage.

--*Following answer supplied by Risk Management Solutions, 2008*

Construction types and characteristics used in the model are in keeping with insurance industry norms for categorizing hurricane risks. Our model includes a variety of schemas that can be selected including ATC, and ISO, which are common designations. In addition, we also have more refined schemas that can be applied. The same is true of secondary modifiers that can be used when more site specific information is available to further characterize site specific conditions noted.

Range and direction of variations in damage are very difficult to generalize since they tie back to the various parameters used in conjunction with the construction type (occupancy, number of stories, year built, and secondary modifiers).

46. Document and justify all modifications to the vulnerability functions due to building codes and their enforcement.

---*Following answer supplied by Risk Management Solutions, 2008*

RMS has implemented distinct vulnerability regions in the U.S. Hurricane Model, which address both the building codes in place and the enforcement of these codes. For Florida there are two distinct regions. One is indicative of the area of influence of the South Florida Building Code in the southeastern region of the state while the rest is a separate region.

47. Besides those identified in the V-2 disclosures (Vulnerability Standard Number 2 of the Florida Commission on Hurricane Loss Projection Methodology), identify and explain all mitigation measures used by the model.

---*Following answer supplied by Risk Management Solutions, 2008*

The RMS U.S. Hurricane Model supports modification of the base vulnerability functions through the application of secondary modifiers developed using the Component Vulnerability Model. The modifiers can be building-characteristic specific (e.g., improved roof sheathing or anchors) or external (e.g., storm shutters). These characteristics must be specifically selected by the user. The default case is to not include any modifiers. If modifiers are selected they are clearly identified in the input files and output reports. The following secondary modifiers are available in the model:

- Roof sheathing strength
- Roof covering
- Roof anchor
- Foundation system
- Wind resistance of window openings
- Wind resistance of doors openings
- Roof geometry
- Opening protection (shutters)
- Percent Complete
- Construction quality and maintenance
- Roof framing type
- Roof maintenance
- Roof age

- Roof parapets
- Mechanical and electrical systems
- Basement
- External ornamentation
- Cladding type
- Architecture elements
- Contents vulnerable to wind

The application of mitigation measures is reasonable when applied both individually and in combination. Each secondary modifier contributes to the coefficient of variation (CV) of a particular damage estimate. As one or more modifiers are applied to a given location, the CV is reduced according to the contribution of those modifiers toward the total CV.

48. Describe in detail how the model estimates damage from bypassing storms. Include examples of storms that reach hurricane strength prior to or subsequent to causing damage in Florida and are not of hurricane strength when damage is caused in Florida.

--*Following answer supplied by Risk Management Solutions, 2008*

Question 48 was answered as part of question 33, with respect to bypassing storms. The stochastic event set for Florida includes storms that reach hurricane strength prior to or subsequent to causing damage in Florida, and are not of hurricane strength when damage is caused in Florida. These types of storm tracks are part of the historical record of landfalling storms in Florida that can contribute to overall loss costs, although the proportion of these events to the overall loss cost is very small (~ 0.1% of total loss cost for the entire state of Florida).

49. Describe in detail how you handle multiple landfalls in the model and how you handle multiple events at a single location in a single season.

--*Following answer supplied by Risk Management Solutions, 2008*

The methodology allows for a single hurricane to make multiple landfalls and for the total losses by that event from all landfalls to be calculated. The stochastic database contains events making landfall in the U.S. and by-passing storms as it is calibrated to the NHC HURDAT database which includes multiple landfalling storms as well as by-passing storm events. Losses from by-passing storms are considered once the storm reaches Category 1 wind speeds and causes loss in Florida. The wind speeds causing damage could be greater than or less than Category 1 wind speeds but the maximum winds must correspond to at least Category 1 for the storm to be considered.

The RMS Hurricane Model does not account for aggregate damage that can occur from a location being impacted from multiple storms over the course of a season.

50. Identify any storms in the historical or the stochastic storm set that cause damage subsequent to 72 hours after the first damage-causing winds in the state of Florida. If your model assumes that this is not possible, explain how one can accurately make such an assumption.

--*Following answer supplied by Risk Management Solutions, 2008*

In order to properly answer this question regarding landfalls occurring 72 hours after first landfall outside of Florida, the full U.S. event set needs to be considered. The full U.S. event set contains 15,716 events, of which the following statistics can be said:

- After first loss in Southeast Florida, 625 events cause a second loss in Texas greater than 72 hours after the first loss
- After first loss in Southern Florida, 355 events cause a second loss in the northeastern U.S. (New York to Maine) greater than 72 hours after the first loss.
- In this same U.S. event set, there are 360 events that cause a first and second loss in Florida, that are greater than 72 hours apart. This contains scenarios of storms that can recurve in either the Gulf of Mexico or Atlantic, causing a second loss causing landfall in the state of Florida 72 or more hours after the first landfall.

51. Provide complete detail concerning the modeler's investigation and handling of claim practices of insurance companies when data for those companies is used to develop or verify model calculations.

--*Following answer supplied by Risk Management Solutions, 2008*

For every claim data set provided to RMS a standard list of questions is addressed to ensure each data set treated consistently with respect to critical calibration issues. Critical issues addressed include the following:

- Property valuation practices
- Claims settlement practices
- Cause of loss coding
- Waiving of deductibles
- Matching claims to exposure data accurately
- Definitions of all fields provided in data sets

Once data is received it is stored with no alterations on a network drive within RMS with limited access. The data received is then documented using a standard form that covers the critical issues described above and summarizes the data received.

52. Describe the analyses performed to validate the model output loss costs using insurance company data that may or may not include the effects of demand surge. Demonstrate how any analyses where Hurricane Andrew losses are used considers the presence of demand surge.

--*Following answer supplied by Risk Management Solutions, 2008*

The RMS model is able to reliably and without significant bias reproduce incurred losses on a large body of past hurricanes, both for personal residential and mobile homes. Validations of known storm losses have been performed in several ways, including:

For recent events, on an industry basis. The RMS model is able to reasonably reproduce aggregate incurred industry losses in recent events.

For recent events, on a company-specific basis. The RMS model is able to reasonably reproduce aggregate incurred losses for a diverse set of insurers.

The RMS model is able to reasonably reproduce the geographic spread of company specific losses, and the spread of losses between various lines of business and between various types of coverages.

For less recent events, on an industry basis. The RMS model is able to reasonably reproduce industry losses for less recent hurricanes, both in aggregate and on a broad geographic basis, for which some level of industry loss data is available.

Insurance companies have supplied RMS with datasets containing the locations and building types associated with coverage and loss amounts. These datasets have been run against historical storms and the computed losses have been compared to the actual losses. Additionally, RMS has calculated losses for all historical storms that have made landfall in the U.S. during the last century.

53. Describe the methods used to account for the implementation of multiple deductibles in the insurers' claim payment historical records for policy periods where more than one hurricane caused damage at a single location. Describe how multiple deductible claim experience in the historical record is included in the projection of future loss costs. Describe any recent changes in the process used to account for multiple deductibles.

--*Following answer supplied by Risk Management Solutions, 2008*

This response is in two parts: first, how claims data is handled with respect to annual aggregate or per event deductibles; and second, with how the model addresses annual aggregate deductibles.

When using claims data, RMS practice includes asking the company providing the claims data to describe the claims handling practices that would affect how deductibles are coded in the claims data when multiple events affect a single location within the same policy period. Based on the answer, RMS will adjust the methods that it uses to correct the gross claims to a ground up basis so that the deductible amount is applied to the correct loss payment by storm.

With regard to model output, the model is developed assuming that each event in the stochastic storm set is independent of the other events, thus each event is assumed to have a separate deductible amount applied to the loss. For annual aggregate deductibles (one value per year regardless of whether two or more storms affect the property), the model output is adjusted using factors supplied with the model.

54. Provide documentation of the rules and procedures that assure accuracy of insurance data used in developing or validating the model.

--*Following answer supplied by Risk Management Solutions, 2008*

This topic is addressed in question 51.

55. Justify any changes from the immediate earlier version of your model of greater than five percent in weighted average loss costs for any county.

--*Following answer supplied by Risk Management Solutions, 2008*

The previous version was RiskLink 6.0a. ZIP Codes were updated in version 6.0b. There were a few cases where the shift in exposure ZIP resulted in different loss costs.

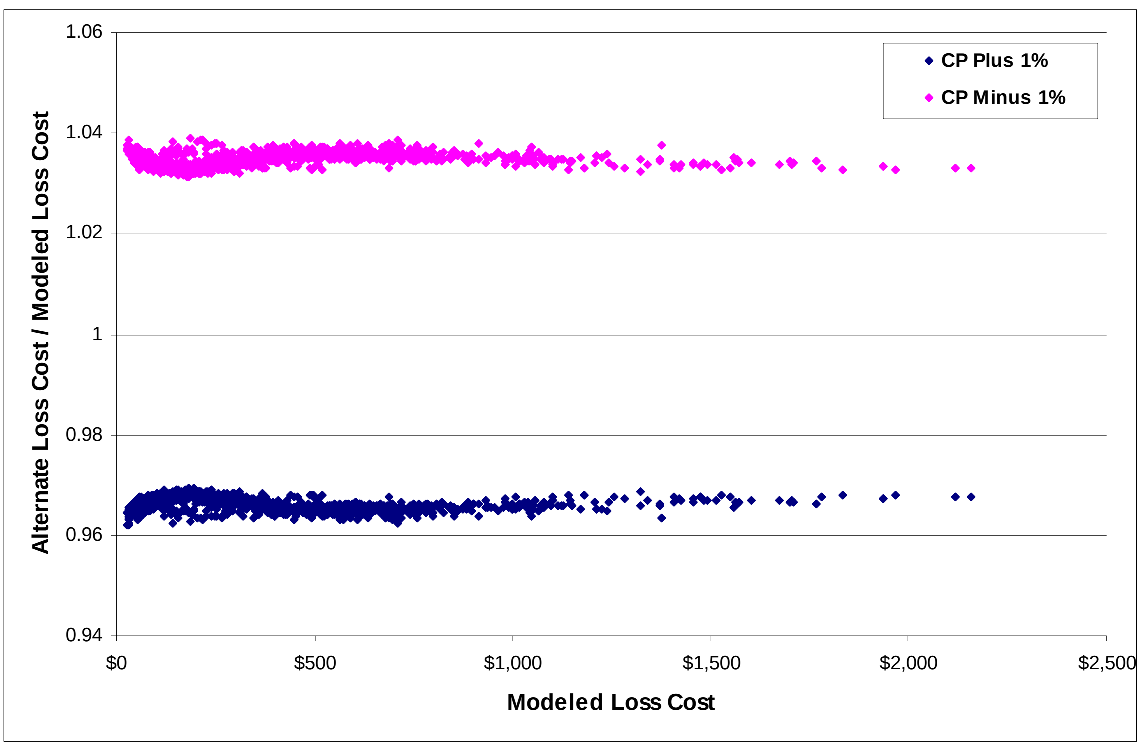
56. Provide sensitivity analyses on annual frequency, central pressure, Rmax, forward speed, and mean damage. Explicitly state the statistical techniques used to perform these analyses. Provide displays of these analyses in a graphical format (e.g. contour plots with temporal animation).

--*Following answer supplied by Risk Management Solutions, 2008*

We calculated the change in loss costs due to a 1% change in the following variables:

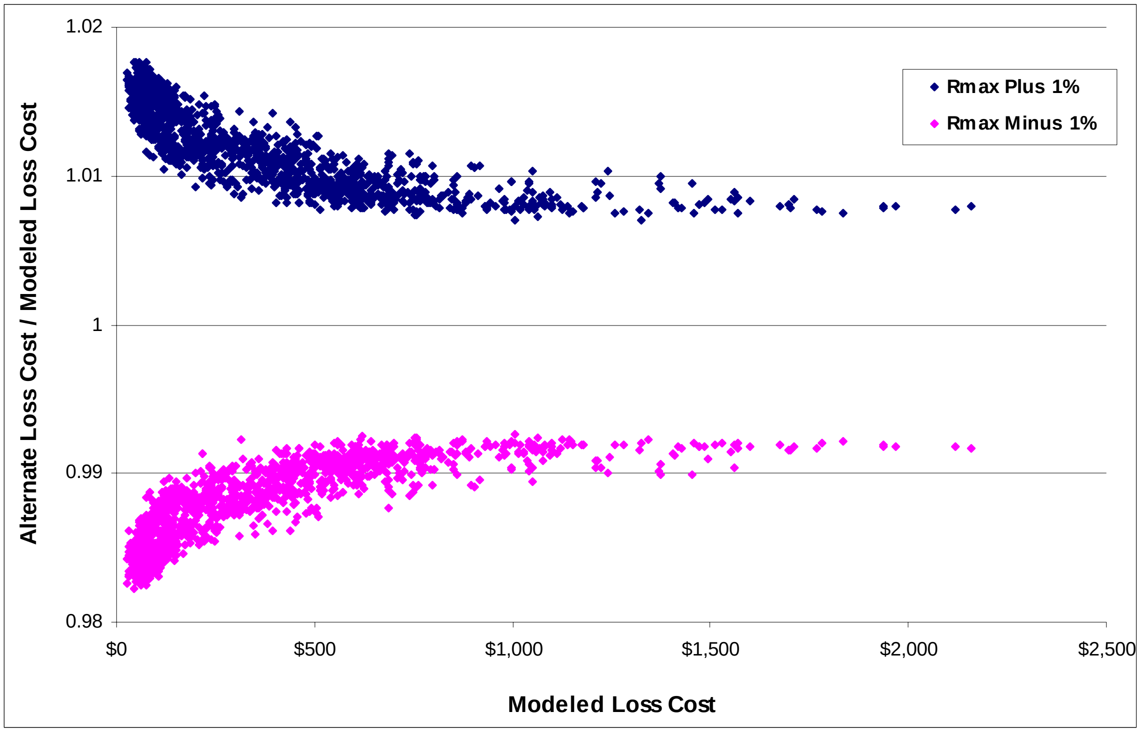
- Central pressure difference
- Rmax
- Forward speed

The figure below shows the change in loss costs due to a 1% change in the central pressure.



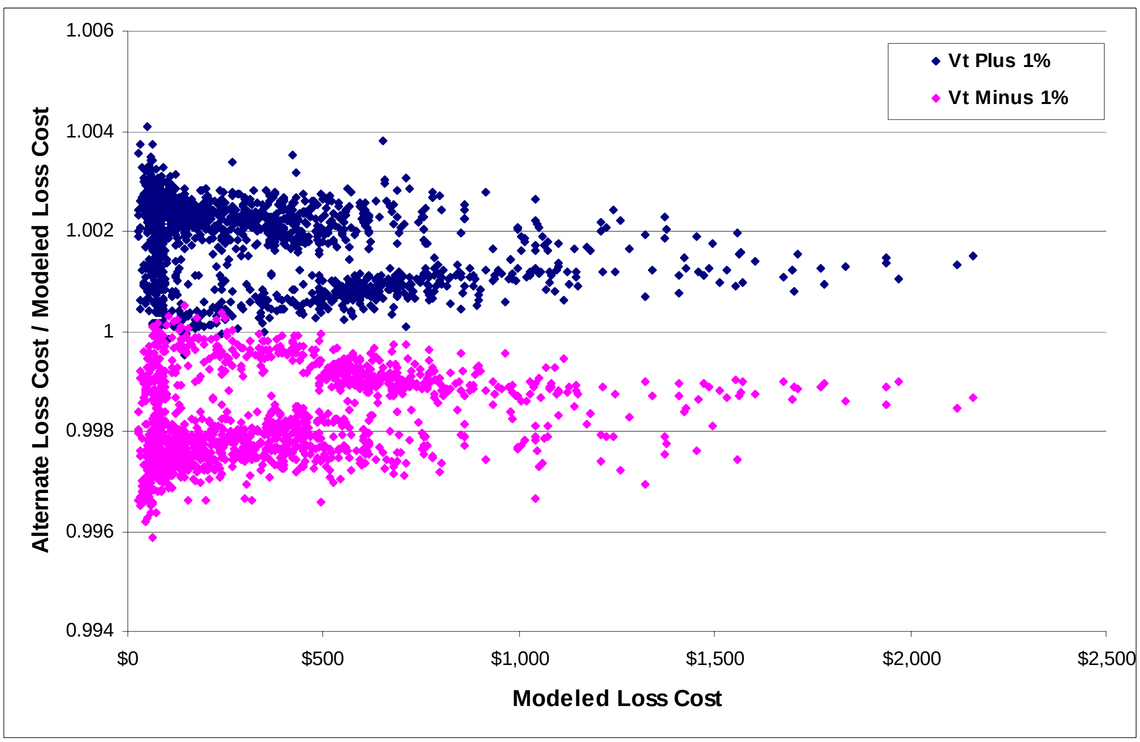
Sensitivity in Loss Costs Due to Central Pressure

The figure below shows the change in loss costs due to a 1% change in Rmax.



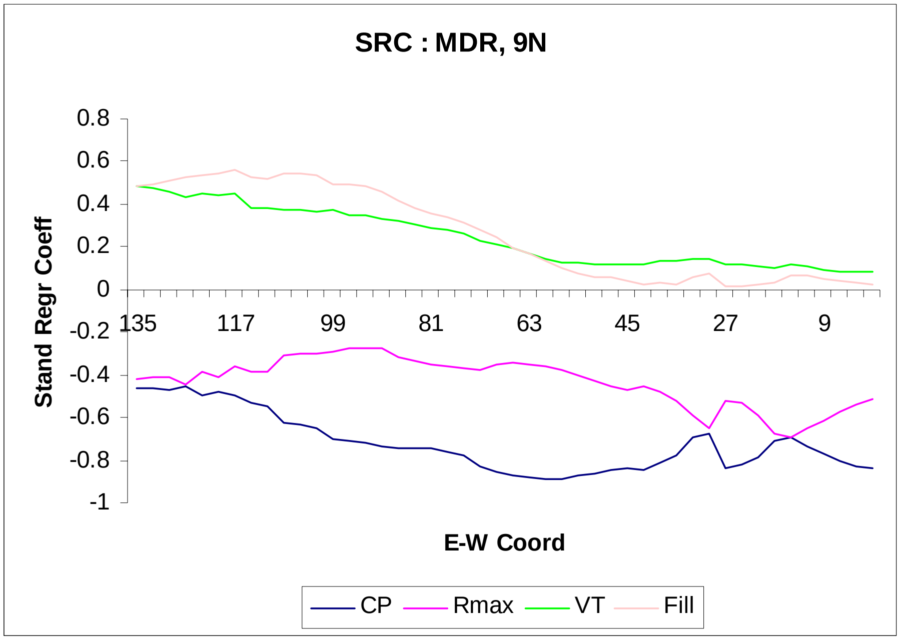
Sensitivity in Loss Costs Due to Rmax

The following figure shows the change in loss costs due to a 1% change in forward velocity.



Sensitivity in Loss Costs Due to Forward Velocity

The figure below is an example of the standard regression coefficients (SRCs) on the mean damage ratios for locations nine miles north of the storm track when simultaneously varying the values of central pressure, Rmax, forward speed, and the exponent in the filling rate formula for a category 1 hurricane.



*Abbreviations: Central Pressure (CP); Radius of Maximum Winds (Rmax); Forward Speed (VT); Filling Rate (Fill)

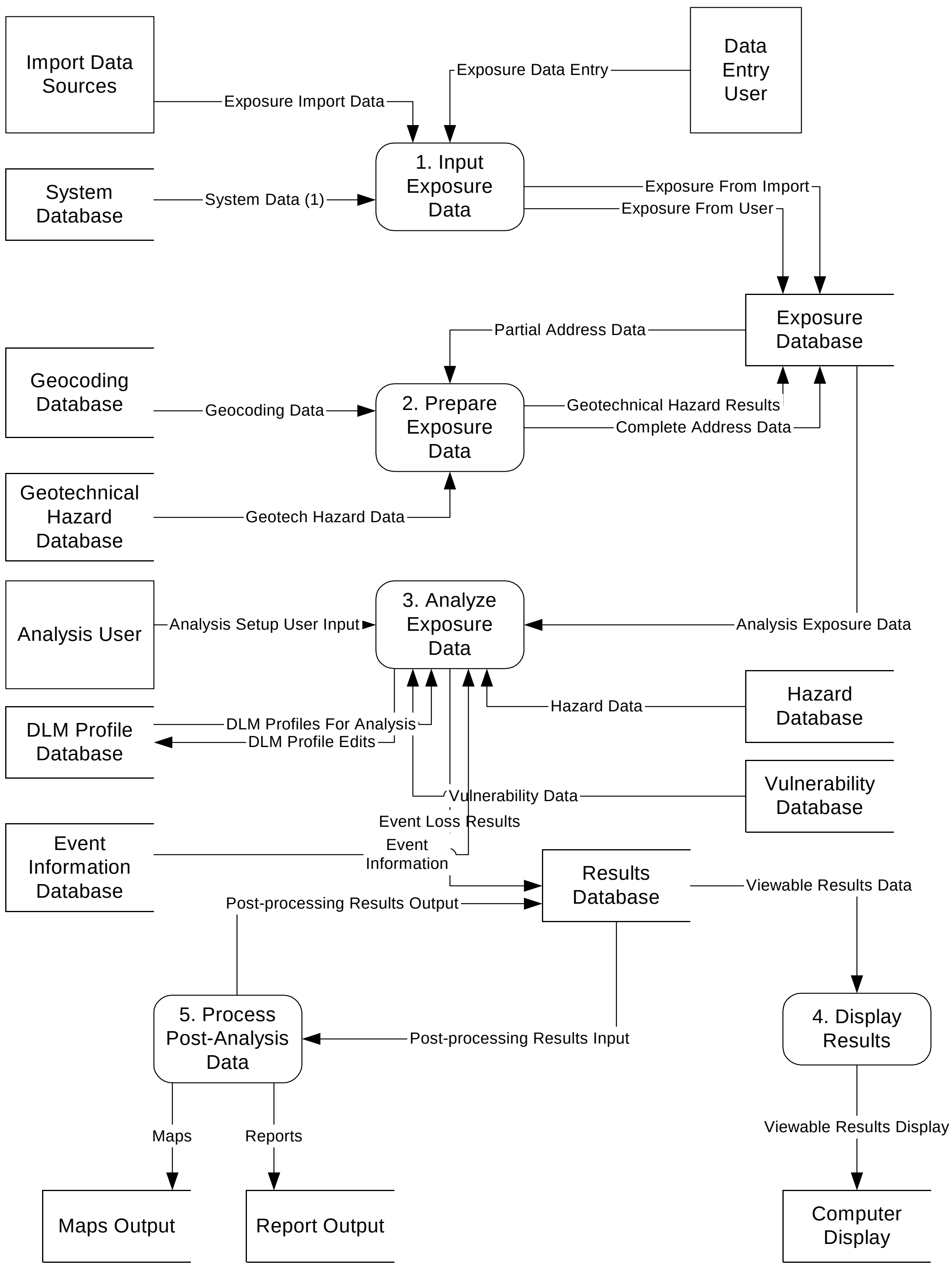
57. Provide detailed control and flow diagrams, completely and sufficiently labeled for each component as well as interface specifications for all components in the model. Each diagram must include components, sub-components, arcs, and labels.

---*Following answer supplied by Risk Management Solutions, 2008*

Please refer to the answer for Question 7-Flow Diagram of Major Model Components, in addition to the information provided below.

RMS maintains documentation of detailed control and data flow, interface specifications, and the schema definitions for all data files and database tables. Data flow diagrams are used to illustrate the relationship between software components and data using a network representation consisting of labeled component processes connected by data arcs, with components expanded into more detailed sub-component diagrams where appropriate. The top-level data flow diagram for the RMS RiskLink software is shown in the following figure.

The architecture for the hurricane model involves breaking the basic components into smaller modules and sub-modules, such as the wind hazard module and the vulnerability module. This structure is carried over into the software architecture.



RiskLink Top Level Data Flow

58. **Provide detailed unit test documentation for testing on each model component, including all aspects of the model (meteorology, actuarial, vulnerability, statistics, user interface, and other components).**

--*Following answer supplied by Risk Management Solutions, 2008*

The component testing procedures can be grouped in the following categories:

Unit Tests

- Manual unit tests are run when components are created or changed. Actual results are compared against expected results documented within specification documents or test cases.
- Automated unit tests are written to test key components that are added or modified. These tests are run periodically throughout the product development cycle.

Aggregation Tests

- Manual aggregation tests are developed and run for features added with the current product release cycle.
- Automated aggregation tests are developed and run for each new feature once it has been integrated into the product and manually tested. Each automated test script is added to the overall product test suite.

Performance Tests

- A suite of performance regression tests are run at specific time intervals within the product development cycle.
- Memory checking tools and code performance profilers are run periodically during the product release cycle, either as a regression test or to diagnose known or suspected performance problems.

59. **Provide the client data processing procedure requirements that assure the integrity and consistency of data.**

--*Following answer supplied by Risk Management Solutions, 2008*

The following validations are done during the import or while entering the data:

- All locations should be geocoded to street (high-resolution), postal code, or county resolutions.
- Limits and deductibles must be greater than or equal to 0. The construction and occupancy schemes default to the Applied Technology Council (ATC) scheme if the data is not present or is invalid. The construction and occupancy classes default to unknown if the data is not present or is invalid.
- A location must have a building, appurtenant, contents, or ALE coverage specified or the location will be excluded from the analysis.
- The percentage completion for all the locations must be between 0 and 100. The default value for percentage completion is 100%.
- The year of retrofit must be greater than or equal to year built. The year built defaults to unknown if unspecified.
- A location can have only one combined coverage (building plus contents).

- If a location has contents coverage, the content grade must be one of the following: unknown damageability, very high damageability, medium damageability, or low damageability. The default value for the content grade is medium damageability.
- The value of an insured asset defaults to zero if not specified.
- If the currency type is not specified, all monetary units are defaulted to the RiskLink system currency.
- All hurricane secondary modifiers are defaulted to unknown if not specified.
- If an invalid reinsurance policy inception or expiration date is specified, the reinsurance inception date is defaulted to the current date and the expiration date is defaulted to a year from the current date.
- All policies must have a valid peril specified.
- All percentage entries in the user interface must be between 0 and 100.
- The number of buildings at a location defaults to 1.
- The following additional validations are done to user-input addresses during geocoding:
    - Street-level addresses are compared to a complete USPS database, weighing combinations of all address elements (street name and number, city, ZIP Code, and state) to minimize incorrect matches.
    - ZIP Code level addresses are validated against a database that is organized by county and state, to insure that matches are constrained to the proper geographic region.

COMMERCIAL CATASTROPHE MODEL SUPPORT DOCUMENT
RMS® RiskLink 6.0b

Part B

1. Identify the particular Catastrophe Model that is used in this filing to:

- **a. project hurricane losses**
- **b. determine probable maximum loss levels**
- **c. determine the cost of reinsurance**

This identification should include the name and location of the firm that created the model, the name of the model, and the version number of the model.

--*Answer supplied by Citizens Property Insurance Corporation*

The Catastrophe Model used in the filing was created by:
Risk Management Solutions, Inc. - RMS
7015 Gateway Boulevard
Newark, CA 94560

The name and version number of the model are as follows: RiskLink Version 6.0b

2. In an electronic format, provide the detailed input that you provided to the modeler along with a list of all adjustments made by you prior to giving the input to the modeler necessary to conform this input to the model's input requirements. Be sure to provide a detailed description of each data field. Include any default values that you specified for missing or invalid information. Describe any exposures affected by this filing that were not included in your input to the model. Describe any exposures included in your input to the model that are not part of this rate filing. Note – if the model was run in-house, you should still provide the detailed input along with a statement of who was responsible for running the model and what controls were in place to ensure that the version of the model provided to you was not altered.

--*Answer supplied by Citizens Property Insurance Corporation*

The Catastrophe Model was run in-house by Citizens' Catastrophe Modeling Analyst. To ensure that the version of the model provided to us was not altered, we retain only one version of the most current software. The RMS, RiskLink software is installed and validated by our Catastrophe Modeling team. Please see file named "CNR Detailed Input.mdb" for the detailed input data imported into the model. Please see file named "DetailedDataFieldDescription.doc" for the detailed input and for the description of each data field. Citizens did not make any adjustments to this data. The modeled exposures are as of 12/31/2008.

3. **In an electronic format, provide the ACTUAL complete model output, documentation, and reports provided to you by the modeler (or produced by you if you ran this model in-house).**

-- ---*Answer supplied by Citizens Property Insurance Corporation*

Please see file named, "December 2008 Commercial Results_Version 6.0b" for the complete model output and results produced by the model.

4. **Provide an explanation with appropriate supporting information showing how the results from the model were included in column (20) of the Standardized Rate Level Indications Form. No modifications or adjustments may be made to the results of the model.**

---*Answer supplied by Citizens Property Insurance Corporation*

5. **Provide a listing of the experts that you relied on concerning those aspects of the model outside your area of expertise.**

---*Answer supplied by Citizens Property Insurance Corporation*

RMS' staff is comprised of a multi-disciplinary team of experts. A list of the relevant employee staff and credentials is covered in Standard G-2.2 of RMS' filing with the Florida Commission on Hurricane Loss Projection Methodology (FCHLPM). For your reference this is provided here.

Independent peer reviews for RMS are also provided in the response to Question 29.

6. **State the extent to which the model has been reviewed or opined on by experts in the applicable fields, including any known significant differences of opinion among experts concerning aspects of the model that could be material to your use of the model.**

---*Answer supplied by Citizens Property Insurance Corporation*

In addition to the extensive testing that RMS has itself performed on its U.S. Hurricane model, and in addition to the many contributions by the outside experts listed above whose names and reputations rest upon the quality of their work, an overall review of the 1997 released version of the U.S. Hurricane model was conducted in March 1997 by Dr. Robert Sheets, former director of the NHC

ISO, a national industry group, has also reviewed the 1997 released version of the RMS U.S. Hurricane model. ISO elected to utilize RMS technology as the basis for their loss costs filings in hurricane-prone states.

The current version of the RMS U.S. Hurricane model builds upon the strengths of previous versions; we therefore include the following discussion of the reviews conducted on the original RMS U.S. Hurricane model to illustrate the consistent and comprehensive approach that RMS takes to validate and substantiate its models.

Dr. Robert Simpson and Mr. Glenn Meyers reviewed the original version of the RMS U.S. Hurricane model without compensation. These reviews were performed in late 1993.

In 1993, the RMS U.S. Hurricane model was selected by ISO to be the methodology upon which it would file revised catastrophe procedures in the calculation of property loss costs. The model was carefully examined and a validation procedure was performed comparing the model output to ISO losses for specific storms by a team of 10 members of the ISO actuarial staff over a six-month period ending in January 1994. Highlights of the validation efforts of RMS engineers, ISO, and RMS clients include:

Convergence. The statistical "completeness" of the stochastic database was tested, and was found to represent the range of potential storm occurrences.

Rate of occurrence. The modeled frequency of storm occurrences was compared to the historical record, and was found to closely replicate the historical rate of occurrence.

State-of-the-art. The hurricane wind-field model was compared to the state-of-the-art methodologies developed and utilized by the engineering community for the estimation of wind speeds for the purpose of hazard analyses of critical facilities. The evaluation concluded that the RMS approach was as well-founded as such methodologies.

Meteorological review. ISO retained Dr. Robert Simpson, the co-developer of the Saffir/Simpson scale and former Director of the NHC, to perform an independent review of the RMS U.S. Hurricane model. He performed the review in late 1993 and provided a written assessment in January 1994. He concluded his assessment by stating: “IRAS is an interactive expert system which can provide a broad and probably unparalleled base of information for insurance decision analysis. From a physical viewpoint, the model as a follow-on to similar stochastic purposes should provide the most comprehensive assessment of damage potential available, with discrimination over smaller scale areas than heretofore available.”

The following experts were hired by RMS to contribute during key stages of past RMS U.S. Hurricane model designs and development:

Mr. Charles J. Neumann, a meteorologist who compiled the Atlantic basin storm database (known as HURDAT). Mr. Neumann, who consulted with RMS between 1992 and 2000, conducted a private review and update of the HURDAT database for RMS using knowledge and information that was not available to him or not used at the time at the time of original compilation at the NHC.

Dr. Tim Reinhold, of Clemson University gave substantial input to the wind field modeling and vulnerability portions of the model in late 1996.

9. Explain how you determined that the particular model you used was appropriate for use in this filing.

---*Answer supplied by Citizens Property Insurance Corporation*

The Responses to question 13 below demonstrates the due diligence efforts Citizens performs before using the model results. After validation is complete for both exposures and modeled losses, an internal peer review is held with the actuarial group and actuarial consultants to unanimously determine whether it is appropriate to use the model results, subject to any necessary adjustments.

10. Explain how you examined the model output for reasonableness, considering factors such as the following:

--*Answer supplied by Citizens Property Insurance Corporation*

a. The results derived from alternate models or methods.

Insurance Services Office, Inc. (ISO) used two different methodologies to develop indicated statewide average rate changes for Citizens' commercial non-residential program in the High Risk Account. The differences between these two methodologies are briefly summarized as follows:

- The first methodology used by ISO incorporates a provision for hurricane losses based entirely on output of the RMS hurricane model being run on Citizens' book of business as of 12/31/2006.

- The second methodology used by ISO incorporates a provision for hurricane losses based on "adjusted" ISO loss cost information. The ISO loss costs were adjusted to better reflect the characteristics of the type of business written by Citizens in the commercial non-residential program in the High Risk Account. Output from the RMS model was relied upon to develop some of the adjustment factors that were used to modify the ISO loss costs.

The rationale for preparing the second method (which is based on adjusted ISO loss cost information) was to assess the reasonableness of the rate indications from the first method (which includes a hurricane provision based entirely on output from the RMS hurricane model). It turned out that these two different methodologies resulted in indicated statewide average rate changes that were reasonably similar. The ISO report (dated 9/21/2007) provides the details of these two different rate indications. The ISO report is being provided to the OIR as part of the Citizens' rate filing.

b. How historical observations compare to the results produced by the model.

Comparisons of historical observations to modeled results are covered in RMS' filing with the Florida Commission on Hurricane Loss Projection Methodology (FCHLPM). Please see file named 'RMS07Standards_S-5 Replication of Known Hurricane Losses.pdf'

c. The consistency and reasonableness of relationships among various output results.

Citizens' Catastrophe Modeling analysts and Actuarial group do extensive checks of the output data to ensure there is no discontinuity. Comparisons are made of modeled loss shifts due to model changes, modeled loss shifts due to exposure changes, and modeled loss shifts due to both model and exposure changes. These analyses are performed to evaluate whether the changes in model loss estimates are consistent with what would have been expected. These expectations are based on Citizens' knowledge of what coverage mixes, amount of insurance changes, or deductible changes have taken place since the previous model run as well as what model updates or improvements have been made by RMS since the previous model version. Through this analysis, Citizens generates questions for RMS relating to: frequency and severity changes, damage function changes, and incorporation of new scientific data. Through a cooperative effort between RMS and Citizens, these questions are researched in order to confirm that the changes in modeled loss estimates are consistent with the enhancements made to the model as well as with any changes in Citizens exposures.

d. The sensitivity of the model output to variations in your input and model assumptions.

In order to enhance confidence in the model regarding sensitivity of the model to variations in input and assumptions, Citizens relies on extensive sensitivity testing by the modeler. Sensitivity of the model output with respect to the simultaneous variation of input variables and a detailed explanation of the sensitivity analyses that have been performed on the model are covered in RMS' filing with the Florida Commission on Hurricane Loss Projection Methodology (FCHLPM). Please see file named 'RMS07Standards_S-2 Sensitivity Analysis for Model Output.pdf'

11. Provide all available comparison of model results with actual historical observations for your company or group. These comparisons should be provided by program/product line and territory within program/product line.

--*Answer supplied by Citizens Property Insurance Corporation*

Recent hurricane activity has provided some historical experience that can be compared to modeled loss using the exposure at the time of the event. Below is a comparison of actual historical experience to modeled losses for Hurricane Wilma during the 2005 hurricane season.

Hurricane Wilma	
Storm Footprint released 10/27/05	1,471,814,233
HRA Ultimate Loss @ 4/30/09	1,838,000,000
Actual vs. Modeled Storm Footprint	25%

12. State and provide complete support for the credibility that you have assigned to the output of the model by program/product line and territory within program/product line.

--*Answer supplied by Citizens Property Insurance Corporation*

At this time, we feel that the RMS model provides the best estimate of our expected annual hurricane losses. A credibility weighting of 100% has been applied to the RMS model for all policy types and territories since we have not used any other sources to estimate our expected annual hurricane losses.

Citizens Property Insurance CAT Modeling Input File Data Field Description
RMS, RiskLink

Field Name	Data Type	Description
ACCNTNUM	Text	Unique Account Identifier
POLICYNUM	Text	Policy Number
ACCNTNAME	Text	Policy Number
USERDEF1	Text	Territory Code
USERDEF2	Text	Policy Form Identifier
USERDEF3	Number	Location Identifier
USERDEF4	Number	Product Line Identifier
LOBNAME	Text	Line of Business Name
POLICYTYPE	Text	Type of Policy
EXPIREDATE	Date/Time	Policy Expiration Date
BLANPREMAMT	Number	Premium Amount
ACCNTNUM	Text	Unique Account Identifier
LOCNAME	Text	Policy Number
LOCNUM	Text	Location Number
STREETNAME	Text	Location Street Address
CITY	Text	Location City
STATECODE	Text	Location State Code
POSTALCODE	Number	Location
COUNTY	Text	Location County
CNTRYCODE	Number	Location Country Code
CNTRYSCHEME	Text	Location Country Scheme
BLDGSCHEME	Text	Building Scheme (RMS)
BLDGCLASS	Number	Building Construction Code
OCCSCHEME	Text	Occupancy Scheme (RMS)
OCCTYPE	Number	Occupancy Type
USERID1	Text	Territory Code
YEARBUILT	Text	Construction Year
NUMSTORIES	Number	Number of Stories
WSSITELIM	Number	Site Limit Amount
WSSITEDED	Number	Site Deductible Amount
WSCV4VAL	Number	Coverage A Value
WSCV5VAL	Number	Coverage B Value
WSCV6VAL	Number	Coverage C Value
WSCV7VAL	Number	Coverage D Value
WSCV4LIMIT	Number	Coverage A Limit
WSCV6LIMIT	Number	Coverage C Limit
WSCV4DED	Number	Coverage A Deductible
WSCV6DED	Number	Coverage C Deductible
ROOFGEOM	Text	Roof Shape
ROOFSYS	Text	Roof Type
RESISTOPEN	Text	Shutter Protection
ROOFANCH	Text	Roof To Wall Connection
CLADRATE	Text	Roof Deck Attachment
FLOORAREA	Text	Square Footage

- Issuer, investment bank and investor modeling of financial risk, expected yield, and risk correlation for bond issues based on catastrophe risk

G-2.1.f Indicate if the modeling organization has ever been involved in litigation or challenged by a statutory authority where the credibility of one of its U.S. hurricane model versions was disputed. Describe the nature of the case and the conclusion.

RMS has interacted with several departments of insurance (DOI's) (such as FL, HI, and LA) in the context of hurricane rate making. None of these relationships have been adversarial.

G-2.2 Professional Credentials

G-2.2.a Provide in a chart format (a) the highest degree obtained (discipline and University), (b) employment or consultant status and tenure in years, and (c) relevant experience and responsibilities of individuals involved in the primary development of or revisions to the following aspects of the model:

1. Meteorology
2. Vulnerability
3. Actuarial Science
4. Statistics
5. Computer Science

The highest degree obtained, employment or consultant status, and tenure is provided in Table 2 through Table 6. The relevant experience of these individuals follows.

Table 2: Individuals Involved in Meteorological Aspects of the Model

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Mr. Kyle Beatty	M.S., Meteorology University of Oklahoma	S[1]	3.5	P/L
Dr. Fouad Bendimerad	Ph.D., Civil Engineering Stanford University	S[2]	11.5	P
Dr. Auguste Boissonnade	Ph.D., Civil Engineering Stanford University	S	12.5	P/L
Dr. Rex Britter	Ph.D., Fluid Mechanics Monash University	C	N.A.[3]	P/L
Dr. Nicholas Cook	Ph.D., Aeronautical Engineering University of Bristol	C	N.A.[3]	P/L

[1] Mr. Beatty left RMS in December 2005.
[2] Mr. Bendimerad left RMS in June 2005.
[3] Non-RMS Staff

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Dr. Katie Coughlin	Ph.D., University of Washington	S	1	L
Mr. Joshua Darr	M.S., Atmospheric Science State Univ. of New York at Albany	S[4]	4.5	L
Ms. Alpana Das	M.S., Mathematical Statistics University of Delhi	S	8	P/L
Dr. Alan Davenport	Ph.D., Civil Engineering, University of Bristol	C	N.A.[3]	P
Dr. Richard Dixon	Ph.D., Meteorology University of Reading	S[5]	5	P/L
Dr. Michael Drayton	Ph.D., Applied Mathematics Cambridge University	S/C	8/4.5	P/L
Mr. Thomas Foster	M.S., Geology University of Michigan	S	1.5	P/L
Dr. Surya Gunturi	Ph.D., Civil Engineering Stanford University	S[6]	13.5	P/L
Dr. Steve Jewson	Ph.D., Climate Modeling Oxford University	S	8	L
Dr. Shree Khare	Ph.D., Atmospheric and Oceanic Sciences, Princeton University	S	1.5	L
Dr. Roberta Mantovani	Ph.D., Physics, University of Rome	S	1	L
Dr. Craig Miller	Ph.D., Engineering Science University of Western Ontario, Canada	S/C	6.5/4.5	P/L
Dr. Chris Mortgat	Ph.D., Civil and Geotechnical Engineering, Stanford University	S	12.5	P
Dr. Robert Muir-Wood	Ph.D., Earth Sciences Cambridge University	S	12	P/L
Mr. Hemant Nagpal	B.E., Civil Engineering, Delhi College of Engineering, India	S[7]	2	P/L
Mr. Charles Neumann	M.S., Meteorology, University of Chicago; Former Director of Research, U.S. National Hurricane Center; and former consultant to Science Applications International Corporation (SAIC) (Retired)	C	N.A.[3]	P
Mr. Matthew Nielsen	M.S., Atmospheric Science Colorado State University	S	2.5	L
Dr. Adam O'Shay	Ph.D., Meteorology Florida State University	S[8]	1.5	L
Ms. Pooja Sayal	B.S., Civil Engineering, Delhi College of Engineering, India	S[9]	2	P/L
Mr. Hemant Shah	M.S., Civil Engineering Stanford University	S	18.5	P
Dr. Mohan Sharma	Ph.D., Structural Engineering Stanford University	S[10]	11	P/L
Dr. Robert Sheets	Ph.D., Meteorology, University of Oklahoma	C	N.A.[3]	P

[4] Mr. Darr left RMS in May 2007.
[5] Mr. Dixon left RMS in August 2006.
[6] Dr. Gunturi left RMS in May 2006.
[7] Mr. Nagpal left RMS in September 2005.
[8] Mr. O'Shay left RMS in June 2007.
[9] Ms. Sayal left RMS in December 2005 and rejoined in July, 2006
[10] Dr. Sharma left RMS in August 2005.

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Mr. Jayanta Singha	B.S. Civil Engineering, College of Technology, G.B. Pant University of Agriculture & Technology	S[11]	4	L
Ms. Beth Stamann	High School Diploma,	S	12.5	L
Dr. Pane Stojanovski	Ph.D., Structural Engineering University of Skopje, Macedonia	S	15	P/L
Dr. Dave Surry	Ph.D., Aerospace Science and Engineering, University of Toronto	C	N.A.[3]	P
Dr. Christine Ziehmann	Ph.D., Meteorology Frie University of Berlin	S	7	L

Table 3: Individuals Involved in Vulnerability Aspects of the Model

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Mr. Munish Arora	M.S., Planning from School of Planning and Architecture, New Delhi	S	2	P/L
Dr. Fouad Bendimerad	Ph.D., Civil Engineering Stanford University	S[12]	12.5	P
Dr. Auguste Boissonnade	Ph.D., Civil Engineering Stanford University	S	12.5	P/L
Ms. Kimberley Court	M.S., Engineering Science University of Western Ontario, Canada	S	2.5	P/L
Mr. Prasad Gunturi	M.Eng., Structural Dynamics, Indian Institute of Technology, Roorkee	S[13]	2	P
Dr. Surya Gunturi	Ph.D., Civil Engineering Stanford University	S[14]	13.5	P
Dr. Atul Khanduri	Ph.D., Civil Engineering Concordia University	S[15]	7.5	P
Mr. Philip D. LeGrone	B.A. Industrial Engineering University of Florida	S[16]	6.5	L
Mr. Jason Lin	Ph.D. Aeronautic Engineering Nanjing University of Aeronautics & Aerospace, China	S[17]	1	L
Mr. Manabu Masuda	M.S., Civil Engineering, Stanford University	S	4	P/L
Mr. Rohit Mehta	M.S., Statistics, California State University, Hayward	S	7.5	P/L
Dr. Charles Menun	Ph.D., Structural Engineering University of California, Berkeley	S	2.5	L
Mr. Guy Morrow	M.S., Structural Engineering University of California, Berkeley	S	14	P/L

[11] Mr. Sinha left RMS in October 2006.
[12] Mr. Bendimerad left RMS in June 2005.
[13] Mr. Gunturi left RMS in January 2007.
[14] Dr. Gunturi left RMS in May 2006.
[15] Dr. Khanduri left RMS in June 2003.
[16] Mr. LeGrone left RMS in March 2007.
[17] Mr. Lin left RMS in May 2006.

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Dr. Chris Mortgat	Ph.D., Civil and Geotechnical Engineering, Stanford University	S	12.5	P
Dr. Dale Perry	Ph.D., Structural Engineering, University of California, Berkeley	C	N.A.[3]	P
Dr. Mohsen Rahnama	Ph.D., Structural Engineering, Stanford University	S	9	L
Dr. Timothy Reinhold	Ph.D., Engineering Mechanics Virginia Polytechnic Institute & State University	C	N.A.[3]	P
Mr. Agustin Rodriguez	M.S., Structural Engineering University of California, Berkeley	S[18]	7.5	P/L
Dr. Mohan Sharma	Ph.D., Structural Engineering, Stanford University	S[19]	11	P/L
Dr. Peter Sparks	Ph.D., Civil Engineering, University of London	C	N.A.[3]	P
Dr. Norris Stubbs	Eng.Sc.D., Columbia University	C	N.A.[3]	P
Mr. Michael Young	M.S., Engineering Science University of Western Ontario, Canada	S	4.5	P/L
Ms. Liang Zhang	M.S., Civil/Structural Engineering, Florida Institute of Technology	S	4	P/L

Table 4: Individuals Involved in Actuarial Aspects of the Model

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Mr. Richard Anderson	B.S., Mathematics Illinois State University	S	12.5	P/L
Dr. Auguste Boissonnade	Ph.D., Civil Engineering Stanford University	S	12.5	P/L
Ms. Li Cao	M.A., Economics Georgetown University	S	2	L
Ms. Kay Cleary	B.A., Psychology Northwestern University	S	1.5	P/L
Dr. Weimin Dong	Ph.D., Civil Engineering Stanford University	S	18.5	P
Mr. Sergio Gomez	B.S., Industrial Engineering, Universidad de los Andes, Bogota, Colombia	S[20]	5.5	P/L
Ms. Nathalie Grima	M.S., Mathematics San Jose State University	S	3.5	L
Dr. Surya Gunturi	Ph.D., Civil Engineering Stanford University	S[21]	13.5	P
Ms. Sherry Huang	B.A., Economics and Statistics University of California, Berkeley	S[22]	3	P

[18] Mr. Rodriguez left RMS in June 2007.
[19] Dr. Sharma left RMS in August 2005.
[20] Mr. Gomez left RMS in February 2007.
[21] Dr. Gunturi left RMS in May 2006.
[22] Ms. Huang left RMS in September 2005.

Mr. Eric Laszlo	M.S., Mathematics California State Polytechnic	S	2.5	L
Dr. Paul MacManus	Ph.D., Mathematics Yale University	S[23]	2	L
Mr. Jonathan Moss	B.A., Mathematics St. Norbert College, De Pere, Wisconsin	S	9.5	P/L
Mr. Matthew Nielsen	M.S., Atmospheric Science Colorado State University	S	2.5	L
Mr. Mitch Sattler	M.S., Statistics Louisiana State University	S	13	P/L
Dr. Fei Sha	Ph.D., Economics University of Kansas	S	1	L
Mr. Joel Taylor	B.S. Mathematics Bradley University	S	1	L
Mr. Michael Young	M.S., Engineering Science University of Western Ontario, Canada	S	4.5	L
Ms. Christine Wallinger	B.A. Mathematics Bradley University	S	2.5	P/L

Table 5: Individuals Involved in Statistical Aspects of the Model

Name	**Credentials**	**Staff (S)/ Consultant (C)**	**Tenure (Years)**	**Previous Model (P) /Latest Generation Model (L)**
Mr. Richard Anderson	B.S., Mathematics Illinois State University	S	12.5	P/L
Dr. Enrica Bellone	Ph.D., Statistics University of Washington	S	2.5	L
Dr. Auguste Boissonnade	Ph.D., Civil Engineering Stanford University	S	12.5	P/L
Dr. Anders Brix	Ph.D., Statistics, Royal Veterinary and Agricultural University, Denmark	S[24]	4.5	P
Dr. Han Chen	Ph.D., Geophysics, Institute of Geophysics at SSB, China	S	14	P/L
Dr. Weimin Dong	Ph.D., Civil Engineering Stanford University	S	18.5	P
Mr. Rohit Mehta	M.S., Statistics, California State University Hayward	S	7.5	P/L
Dr. Gilbert Molas	Ph.D., Civil Engineering University of Tokyo	S	12.5	P/L
Mr. Guy Morrow	M.S., Structural Engineering University of California, Berkeley	S	13	P/L
Dr. Chris Mortgat	Ph.D., Civil Engineering Stanford University	S	12.5	P
Mr. Mitch Sattler	M.S., Statistics Louisiana State University	S	13	P/L
Dr. Mohan Sharma	Ph.D., Structural Engineering Stanford University	S[25]	11	P/L

[23] Mr. MacManus left RMS in June 2007.
[24] Dr. Brix left RMS in May 2005.
[25] Dr. Sharma left RMS in August 2005.

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Ms. Christine Wallinger	B.A. Mathematics Bradley University	S	1.5	P/L

Table 6: Individuals Involved in Computer Science Aspects of the Model

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Ms. Shobana Azariah	M.Phil., Public Administration University of Madras, India	S	6.5	P/L
Mr. Sitaram Baldwa	B.E., Computer Science University of Jodhpur, India	S	7.5	P/L
Mr. Aman Bhardwaj	M.S., Computer Applications Institute of Management Technology India	S	7	P/L
Ms. Arundhati Bopardikar	M.A., Economics University of Pune, India; M.S., Computer Science, California State University, Hayward,	S	3.5	P/L
Mr. David Carttar	M.S., City Planning University of California, Berkeley	S	13.5	P/L
Dr. Han Chen	Ph.D., Geophysics Institute of Geophysics at SSB, China	S	14	P/L
Dr.Sandra Cruze	Ph.D., Business Golden Gate University	S	1	L
Mr. Peter D'Costa	M.S., Computer Science University of South Carolina	S	11.5	P/L
Ms. Vijaya Divakaruni	M.S., Computer Applications Andhra University, India; B.S., Electronics, Nagarjuna University, India	S	6.5	L
Mr. Uday Eyunni	M.S., Computer Science University of Alabama	S[26]	12	P
Ms. Kalpana Ganesan	M.S., Computer Science University of Nebraska, Lincoln	S[27]	1.5	P
Mr. Amit Kaura	M.S., Computer Science California State University M.S., Applied Mathematics Indian Institute of Technology, Rorkee, India	S	4	P/L
Mr. Garrett Girod	B.S., Computer Science Louisiana Tech University	S	6	P/L
Mr. David Glaubman	B.S., Mathematics Northeastern University, Boston	S	3	L
Mr. Bikramjit Singh Goraya	M.S., Industrial Electronics, Moscow Power Engineering Institute, Russia	S	8	P/L
Mr. Gary Gray	B.S., Business California State University, Northridge	S	5	P/L
Mr. Brent Hamstreet	B.S., Computer Engineering Santa Clara University	S[28]	10.5	P

[26] Mr. Eyunni left RMS in June 2006.
[27] Ms. Ganesan left RMS in December 2006.
[28] Mr. Hamstreet left RMS in April 2007.

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Mr. Sridhar Iyer	M.S., Computer Science West Virginia University	S	9	P/L
Mr. Amit Jain	M.S., Computer Applications Agra University, Agra, India	S	8	P/L
Mr. Vikrant Kalhan	M.A., Computer Applications Institute of Management & Technology, India	S[29]	9.5	P
Mr. Sameer Khandekar	B.S., Electrical Engineering University of Pune, India	S[30]	2.5	P
Dr. Chang Liu	Ph.D., Civil Engineering McGill University, Canada	S[31]	8	P
Mr. Rahul Patasariya	B.S., Civil Engineering, Indian Institute of Technology, India	S	1	L
Dr. Scott Martin	Ph.D., Structural Engineering University of California, Irvine	S[32]	9	P
Mr. Rohit Mehta	M.S., Statistics, California State University, Hayward	S	7.5	P/L
Mr. Jonathan Moss	B.A., Mathematics St. Norbert College, De Pere, Wisconsin	S	9.5	P/L
Ms. Roopa Nair	M.S., Statistics Delhi University, India	S	.5	L
Mr. Kannan Narayanan	B.A., Finance and Commerce. University of Madras, Chennai, India;	S	3.5	L
Mr. Terrance Ng	M.S., Computer Science University of Illinois, Chicago	S[33]	5	P
Mr. Narvdeshwar Pandey	M.S., Future Studies and Planning, Devi Ahilya University, Indore, India M.S., Mathematics Gorakhpur University, India	S	5	L
Mr. Ghanshyam Parasram	B.A., Mechanical Engineering Jawahar Lal Nehru Technological University, India	S	2	P/L
Mr. Sunil Patil	B.S., Electrical Engineering University of Pune, India	S	8	P/L
Mr. Thankasala Prasanna	M.S., Aerospace Engineering Texas A&M University	S	10	P/L
Ms. Priya Rajendran	B.S., Computer Science Bharathiyar University	S	5.5	P/L
Mr. John Reed	M.S., Medical Informatics Stanford University	S[34]	12.5	P
Mr. John Reiter	M.S., Computer Science University of Illinois	S	14	P/L
Mr. Rhoderick Rivera	B.S., Computer Engineering University of Illinois, Urbana-Champaign	S	3	P/L
Ms. Pooja Sayal	B.S., Civil Engineering, Delhi College of Engineering, India	S	6	P/L

[29] Mr. Kalhan left RMS in September 2007.
[30] Mr. Khandekar left RMS in August 2007.
[31] Dr. Liu left RMS in August 2005.
[32] Dr. Martin left RMS in December 2005.
[33] Mr. Ng left RMS in March 2006.
[34] Mr. Reed left RMS in July 2005.

Name	Credentials	Staff (S)/ Consultant (C)	Tenure (Years)	Previous Model (P) /Latest Generation Model (L)
Mr. Afsal Seyed	B.S., Computer Science and Engineering, Karnatak Univ, India, B.S., Mathematics Calicut University, India	S	1	L
Ms. Chessy Q. Si	M.A., Geographic Information Systems, State University of New York, Albany, NY	S	11.5	P/L
Dr. Rajesh Singh	Ph.D., Civil Engineering Stanford University Registered Professional Engineer, State of California	S	14.5	P/L
Mr. Jayant Srivastava	M.S., Computer Science, Institute of Management and Technology, India	S	8	P/L
Mr. William Suchland	B.A., Geography, Computer Assisted Cartography, University of Washington	S	11.5	P/L
Mr. James Tomcik	B.S., Computer Science, University of Akron, Ohio	S[35]	6	P/L
Ms. Jianmin Wang	M.S., Computer Science University of Akron, Ohio M.S., Meteorology University of Oklahoma	S	2.5	L
Mr. William Andrew Wheeler	M.A., Mathematics, Portland State University	S	3.5	P/L
Dr. Fan Wu	Ph.D., Computations and Mechanics in Mechanical Engineering Stanford University	S	12.5	P/L
Yen-Tin Yang	M.S., Management Science & Engineering Stanford University M.S., Structural Engineering National Taiwan University	S	3	P/L
Mr. Ying-Jen Yen	MSEE, Computer Engineering Rice University, Texas	S[36]	1.5	L
Ms. Ji Zhang	M.S., Computer Science California State University, East Bay	S	2	P/L

Brief biographies of the RMS technical staff are provided below.

Richard R. Anderson, FCAS, MAAA, Chief Actuary

Mr. Anderson is the Chief Actuary at RMS. Mr. Anderson's responsibilities at RMS include research and development of the financial module used in RMS catastrophe models, the modeling of uncertainty in the catastrophe models, and research and development of enterprise-wide risk modeling for property/casualty insurance companies. Mr. Anderson also has done research and development work on the systematic optimization of capital allocation and the inclusion of catastrophe model output into DFA models. Mr. Anderson earned his B.S. degree in Mathematics from

[35] Mr. Tomcik left RMS in January 2007.
[36] Mr. Yen left RMS in September 2007

Illinois State University. He is a Fellow of the Casualty Actuarial Society and a member of the American Academy of Actuaries.

Hurricane Project Responsibilities: (1) design of the financial module, including the modeling of deductibles and limits, (2) collecting insurance industry loss data for all historical events and updating the losses to current dollar values based on population growth and inflation, which is then used for loss calibration, (3) assessing uncertainty of model generated losses and assigning confidence levels, and (4) sensitivity and uncertainty analyses.

Munish Arora, Engineering Analyst

Mr. Arora holds a M.S. degree in Planning from the School of Planning and Architecture, New Delhi. He has 5 years of industry experience in model development; testing, and vulnerability implementation. He has extensive knowledge of Microsoft Excel, Access, SQL, and VBA platforms and is highly skilled in defining and automating processes to increase productivity and performance. Mr. Arora joined RMS in July 2004 and has been working on various model development and model QA assignments. He is one of the members of the reconnaissance team who visited Florida to study post catastrophe impact of Hurricane Jeanne.

Hurricane Project Responsibilities*:* Planning, implementation, and execution of quality assurance measures in reported model results.

Shobana Azariah, Manager, Software Quality Assurance

Ms. Azariah joined RMS in March 2002, taking a position in the Quality Assurance department. She is currently the manager of the RiskLink software quality assurance group. She graduated from University Of Madras, India with M.A. in Public Administration and spent an additional two years doing research work at the University of Madras in Tamil Nadu, India

Hurricane Project Responsibilities: Manages the quality assurance group that tests the RiskLink user interface

Sitaram Baldwa, Senior Software Engineer

Mr. Baldwa has a Bachelor of Engineering (B.E.) degree in Computer Science and Engineering from the University of Jodhpur (India). Mr. Baldwa designs and develops mapping and other user-interface applications for RMS' core technology. Mr. Baldwa has experience in the design and development of various client/server applications.

Hurricane Project Responsibilities: Detailed design and implementation of enhancements to the mapping and user-interface software components.

Kyle Beatty, Former Manager, Model Management

Mr. Beatty holds M.S. and B.S. degrees in Meteorology from the University of Oklahoma. While at RMS, he oversaw the product marketing and business development activities for the U.S. and Canada climate hazard peril models and derivative products. This included serving as model management lead for the U.S. Hurricane and U.S. and Canada Tornado/Hail models. He is a member of the American Meteorological Society and has authored and presented technical papers at several severe thunderstorm and tropical meteorology conferences.

Hurricane Project Responsibilities: Former lead of U.S. Hurricane model management and contact for RMS with the Florida Commission on Hurricane Loss Projection Methodologies.

Enrica Bellone, Ph.D., Lead Catastrophe Risk Modeller

Dr. Bellone is responsible for researching and implementing advanced modeling techniques. Prior to joining RMS, she conducted postdoctoral research in statistics as applied to the atmospheric sciences, first at the National Center for Atmospheric Research in Boulder, Colorado, and then at University College London. Dr. Bellone received a Ph.D. in Statistics from the University of Washington.

Hurricane Project Responsibilities: Review of model output and sensitivity analyses from a statistical viewpoint.

Fouad Bendimerad, Ph.D., P.E., Former Vice President and Principal Scientist

Dr. Bendimerad holds M.S. and Ph.D. degrees in Civil Engineering from Stanford University. He has over 20 years experience in the field of structural engineering and risk analysis. He is known worldwide as an expert in damage and loss estimation from natural hazards and has published extensively in this subject. He is the secretary of the Earthquakes and Megacities Initiative, an international endeavor sponsored by the United Nations. His project oversight included**:** (1) Probabilistic hazard modeling of natural hazards phenomena; (2) Modeling of structural performance of buildings, lifelines, and commercial/industrial facilities; (3) Earthquake damage estimation; and (4) Decision analysis. He is a principal in the highly complex team project "NIBS," developing nationally applicable standardized methods for assessing earthquake risks (physical damage, functional losses, and economic losses) to buildings and other structural systems. Prior to RMS, Dr. Bendimerad spent seven years at Stanford University where he was in charge of the seismic risk program and maintained a Consulting Professorship in the Civil Engineering Department. Dr. Bendimerad is a Registered Professional Engineer in the State of California, and a member of several professional organizations including the American Society of Civil Engineers.

Hurricane Project Responsibilities: Former advisor on science and technical issues.

Aman Bhardwaj, Lead Software Engineer

Mr. Bhardwaj has a B.S. in General Science from CCS University - Meerut, India and a M.S. degree in Computer Applications from the Institute of Management & Technology, India. Mr. Bhardwaj joined RMS in 2000 and has been involved with designing and developing software for RiskLink, RiskBrowser, and RiskSearch products. For RiskLink, he is responsible for implementation of geotechnical hazard lookup components and libraries.

Hurricane Project Responsibilities: Maintenance and upgrades to the core hazard libraries and components.

Auguste Boissonnade, Ph.D., Vice President and Principal Scientist

Dr. Boissonnade was the original architect of the RMS hurricane catastrophe models and has over 20 years of professional experience in structural analysis and design, natural hazard modeling, and risk assessment of natural hazards in the U.S., Europe, Africa, and Asia. His expertise includes developing risk assessment models for natural hazards (earthquakes, extreme winds, floods and other weather phenomena) for applications in risk assessment of critical facilities and insurance exposures. Dr. Boissonnade has a B.S. degree from Ecole Superieure des Travaux Publics (France) and a Ph.D. from Stanford University where he has been a Consulting Professor. While at Stanford, Dr. Boissonnade performed research on damage estimation with application to the insurance industry. Prior to joining RMS, Auguste was a project leader at Lawrence Livermore National Laboratory with responsibilities for developing probabilistic seismic hazard guidelines for the U.S. Nuclear Regulatory Commission and guidelines on natural phenomena hazards for the Department of Energy. He is a member of the American Meteorological Society and the American Society of Civil Engineers and a reviewer for the National Science Foundation. Dr. Boissonnade has authored more than 50 publications, including one book.

Hurricane Project Responsibilities: (1) Review of overall data generated for use in stochastic simulation; (2) Wind field definition/degradation curves/roughness/ vulnerability curves; (3) Historical and stochastic loss calibration; and (4) Advisor on science and technical issues.

Arundhati Bopardikar, Software Engineer

Ms. Bopardikar has an M.A. in Economics from the University of Pune (India) and M.S. in Computer Science from California State University, Hayward. Ms. Bopardikar designs and develops user-interface applications for RMS' core technology. Ms. Bopardikar has experience in design and development of various client/server applications.

Hurricane Project Responsibilities: Detailed design and implementation of enhancements to various user-interface software components.

Anders Brix, Ph.D., Former Principal Modeler

Dr. Brix was a Principal Modeler based in the RMS London office, with responsibility for researching and implementing advanced modeling techniques. Prior to joining RMS, he developed pricing models and conducted dynamic financial modeling as a statistician in the Instrat actuarial services unit of reinsurance broker Guy Carpenter. Dr. Brix received a Ph.D. in Mathematical Statistics from the Royal Veterinary and Agricultural University in Denmark and has conducted post-doctoral research in statistics at several universities throughout Europe. He received a Cand. Scient. degree in statistics from the University of Copenhagen.

Hurricane Project Responsibilities: Review of model output and sensitivity analyses from a statistical viewpoint.

Li Cao, Financial Modeler

Ms Cao joined RMS in 2006 as a financial modeler. Prior to joining RMS, she worked in the actuarial department for a year and a half at GEICO in Washington, DC. She graduated from Georgetown University with a M.A. in Economics.

Hurricane Project Responsibilities: Ms. Cao is involved in the design, documentation, and quality assurance of the financial model.

David Carttar, Lead Engineer

Mr. Carttar has B.S. degrees in Geography and Architectural Studies from the University of Kansas, and a Master of City Planning degree from the University of California at Berkeley. For RMS, Mr. Carttar coordinates geocoding and mapping applications for the company's core technology. Mr. Carttar's experience revolves around the application of geographic modeling at a variety of technical levels.

Hurricane Project Responsibilities: Updating geocoding capabilities for all hurricane states.

Han Chen, Senior Software Engineer

Dr. Chen has a M.S. in Computer Science from California State University at Hayward and a Ph.D. in Geophysics from the Institute of Geophysics at SSB in China. For RMS, Dr. Chen has worked in the Research and Development Division and is primarily responsible for the detailed design and implementation of enhancements to the RiskLink Detail Loss Model software.

Hurricane Project Responsibilities: Detailed design and implementation of enhancements to the RiskLink Detail Loss Model software, with an emphasis on optimization.

Kay Cleary, Actuary

Ms. Cleary joined RMS' Regulatory Practice in October of 2006. She has over 25 years experience in Property/Casualty insurance with a focus on personal property lines catastrophe risk. She has worked in both the public and private sectors, with stints at Florida's Office of Insurance Regulation and Florida Citizens Property Insurance Corporation. She spent 10 years with Allstate at their Research and Planning Center and several years with Aon Re Services.

Ms. Cleary is an ex-Chair of the American Academy of Actuaries' Property/Casualty Risk-Based Capital Committee, was on the Academy Task Force authoring Actuarial Standard of Practice #38 and co-authored "Reserving for Catastrophes," summarizing a proposal for pre-event tax-deferred catastrophe reserves in the Fall 2002 Forum. She served on the Florida Commission on Hurricane Loss Projection Methodology 2001-2002. Ms. Cleary is a Fellow of the Casualty Actuarial Society, a Member of the American Academy of Actuaries and has a Bachelor of Arts from Northwestern University.

Hurricane Project Responsibilities: Review of model from an actuarial viewpoint and lead contact for RMS with the Florida Commission on Hurricane Loss Projection Methodologies.

Katie Coughlin, Senior Catastrophe Risk Modeller

Dr. Coughlin holds a B.S. from Caltech and a Ph.D. from the University of Washington where she studied empirical mode decomposition of atmospheric variability. Dr. Coughlin joined RMS' Model Development team in 2007 from the Meteorology Department at the University of Reading. She is involved in the development of the U.S. hurricane hazard. She is a member of the Royal Meteorological Society, American Geophysical Union, the American Meteorological Society, the Society of Industrial and Applied Mathematics, and the Mathematical Association of America.

Hurricane Project Responsibilities: Review of meteorological model output and development of hurricane activity rates.

Kimberley Court, Engineering Analyst

Ms. Court holds a M.Sc. from the University of Western Ontario in Canada where she studied wind loading on industrial chimney systems. Ms. Court joined RMS' Model Development team in 2005 and was initially responsible for running analyses during the development of the RiskLink 6.0. Currently, she is working on the loss amplification component for the U.S. Hurricane model. She is an associate member of the American Society of Civil Engineers and the Canadian Society of Civil Engineers.

Hurricane Project Responsibilities: Implementation of the loss amplification model in the software.

Sandra Cruze, Vice President, Quality Assurance

Ms. Sandra Cruze has a doctorate in business from Golden Gate University. She has been at RMS since May 2007. Initially, at RMS she led QA for core products and was responsible for the product development process. More recently, she has also assumed responsibility for model QA. Before coming to RMS, she worked in the management of quality assurance for various technology companies.

Hurricane Project Responsibilities: Ms. Cruze is responsible for overseeing software and model QA and processes.

Joshua Darr, Former Director, Model Management

Mr. Darr holds a B.S. degree in Atmospheric Sciences from Cornell University, and a M.S. degree in Atmospheric Sciences from the University at Albany. He oversees the product marketing and business development activities for the U.S. and Canada climate hazard peril models and derivative product, as well as RMS' models in the Caribbean and for the offshore energy markets. Mr. Darr is also a member of the RMS catastrophe response team for U.S. hurricane, providing meteorological analyses and interpretation of weather patterns as hurricanes form in the Atlantic Ocean basin.

Hurricane Project Responsibilities: Oversight of product marketing and business development for the U.S. Hurricane model.

Alpana Das, Manager

Ms. Das joined RMS India in September 1999. She has M.S. in mathematical statistics from University of Delhi, Delhi, India. She has extensive experience in stochastic modeling and supporting the development, testing and implementation of various hurricane models. She has been instrumental in contributing effectively to the development of windstorm models done for World Bank. She also has extensive experience in the usage of statistical techniques such as multivariate analysis for demand estimation, development of sampling strategy for customized market research, and development of generalized additive models (GAMs) like alternating conditional expectations. She had four years of prior experience with a consulting firm on doing various research projects that included forecasting of demand for power for major states of India, studying consumer preferences for tea in India, infrastructure development reports etc.

Hurricane Project Responsibilities: Ms. Das's focus is on wind model development and testing, client support, and preparing material for regulatory submissions, as well as being involved in the research and development of new models.

Peter D'Costa, Software Engineer

Mr. D'Costa has a B.E. degree in Electrical and Electronics Engineering from Birla Institute of Technology, India, and a M.S. degree from the University of South Carolina. For RMS, Mr. D'Costa works primarily on the user interface for the RiskLink product.

Hurricane Project Responsibilities: Update the data entry and results screens for the user interface.

Vijaya Saradhi Divakaruni, Senior Software Engineer

Ms. Divakaruni joined RMS in June 2000 as a Software Engineer. Her responsibilities include design, development, and unit testing of new features. Prior to joining RMS, she was a Software Engineer at Liquid Software Inc. Ms. Divakaruni holds a M.S degree in Computer Applications from the Andhra University in India.

Hurricane Project Responsibilities: Involved in the design, development and quality assurance of modules used in the RMS U.S. Hurricane model.

Richard Dixon, Ph.D., Former Senior Research Meteorologist

Dr. Dixon joined RMS in January 2001 to undertake studies on the role of the jetstream, in affecting the formation of severe windstorms. Having raised the public profile of the jetstream in generating catastrophic windstorms in Europe, he has most recently looked across the Atlantic to lead the meteorological work to understand the structure and statistics of transitioning hurricanes. Dr. Dixon has a first-class Honors degree in Meteorology and a Ph.D. from the University of Reading, concerning the processes involved in the development of intense extra-tropical cyclone windstorms.

Hurricane Project Responsibilities: Lead researcher in the area of transitioning storms and activity rates, and the impact of transition on hurricane structure and wind fields.

Michael Drayton, Ph.D., Consultant

Dr. Drayton holds a Ph.D. in Applied Mathematics from the University of Cambridge and a first class honors degree in Civil Engineering from New Zealand. Dr. Drayton is primarily involved in the research and development of hazard models. Since joining the RMS London office in early 1996 he has worked on the European windstorm model, the Atlantic hurricane models and the U.K. flood project. He has extensive experience of insurance-related hazard modeling and has also worked as a researcher investigating river flooding and pollution dispersion in the environment. Currently, Dr. Drayton consults to RMS full-time.

Hurricane Project Responsibilities: Development of the stochastic basin-wide event set model.

Weimin Dong, Ph.D., Chief Risk Officer

Dr. Dong is a co-founder of RMS. He has over 30 years of industrial, teaching, and research experience specializing in seismic hazard evaluation and insurance and financial risk assessment. He is the chief architect of the RMS catastrophe models, and has overseen the company's research and development efforts since its inception. Dr. Dong is currently focusing his efforts on further developing the P&C RAROC methodologies, including the RAROC ASP development and various optimization routines. Prior to founding RMS, Dr. Dong served as the Director of Earthquake Research for the General Research Institute, Ministry of Machine Building in China. Dr. Dong received his Ph.D. from Stanford University, and his Master of Engineering Mechanics from Shanghai Jiao Tong University. During his career, he has published books, technical reports, and over 100 papers.

Hurricane Project Responsibilities: Advisor on science and technical issues.

Uday Eyunni, Fomer Lead Software Engineer

Mr. Eyunni graduated with a M.S. in Computer Science from the University of Alabama at Birmingham. Mr. Eyunni joined RMS in 1994. Since then, he has worked on various software products. At RMS, Mr. Eyunni's primary role is to design and develop software for RiskLink and RiskOnline products. Mr. Eyunni has published research papers on parallel computing and compilers.

Hurricane Project Responsibilities: Software design and implementation.

Thomas Foster, Technical Analyst

Mr. Foster joined RMS in June 2006 as a Technical Analyst. He supports the product marketing and business development activities for RMS' U.S. and Canada climate hazard peril models and derivative products, as well as RMS' models in the Caribbean and for the Offshore Energy markets. He holds a M.S. degree in Geology from the University of Michigan at Ann Arbor and a B.S. degree in Meteorology from the Pennsylvania State University at University Park.

Hurricane Project Responsibilities: Support of U.S. Hurricane model management and quality assurance of RiskLink version 6.0a.

Kalpana Ganesan, Former Loss Model Software Engineer

Ms. Ganesan joined RMS in June 2005 as a software engineer in Software Model services. Her responsibilities include design, development and enhancement of features of peril models. Prior to joining RMS, she was a software consultant at amazon.com and Verizon. She has a M.S. in Computer Science from the University of Nebraska, Lincoln.

Hurricane Project Responsibilities: Software implementation and testing for peril models**.**

Garrett Girod, Lead Software Engineer

Mr. Girod has a B.S. degree in Computer Science from Louisiana Tech University. Mr. Girod worked for six years with a USGS scientist studying the effects of hurricanes on wetlands. Mr. Girod also worked two years for K2 Technologies in the development of Catalyst, a catastrophe loss modeling product. For RMS, Mr. Girod develops software enhancements and fixes for various aspects of RiskLink.

Hurricane Project Responsibilities: Maintenance of database, analysis settings, and user-interface software components.

David Glaubman, Software Development Manager

Mr. Glaubman joined RMS in October 2004 as a lead software developer. His responsibilities include management of the team responsible for application infrastructure. Prior to joining RMS, he led development of several financial software products for Barra, Inc. Mr. Glaubman was graduated from Northeastern University in Boston with a B.S. in Mathematics. He is a member of IEEE and the Association for Computing Machinery (ACM).

Hurricane Project Responsibilities: Mr. Glaubman is involved in the design and implementation of software libraries and components used by the loss model engine.

Sergio Gomez, Former Lead Risk Quantification Researcher

Since joining RMS in 2000, Mr. Gomez has been part of the Actuarial and Financial Modeling team. As Lead Risk Quantification Researcher, his responsibilities include designing and documenting various improvements to the RiskLink Financial Module. He has over four years of experience in the financial risk management field and is currently pursuing his associateship in the Society of Actuaries. Sergio has a B.S. degree in Industrial Engineering from the Universidad de los Andes in Colombia.

Hurricane Project Responsibilities: Mr. Gomez is involved in the design, documentation, and quality assurance of the financial model used in the RMS U.S. Hurricane model.

Bikramjit Singh Goraya, Manager, Software Peril Model Services

Mr. Goraya has a B.S. degree in Engineering and a M.S. in Engineering in Industrial Electronics from Moscow Power Engineering Institute, Moscow, Russia. Mr. Goraya has been primarily involved in the software development of the import, export, geocoding, and geotechnical hazard retrieval components of RiskLink. Since June

2006, he has managed the Software Peril Model Services group. Prior to joining RMS in 2000, Mr. Goraya worked for RMSI as a software developer.

Hurricane Project Responsibilities: Software development for the import, export, geocoding, and geotechnical hazard retrieval components, management of software design and implementation of peril model and analysis software components.

Gary Gray, Lead Software Engineer

Mr. Gray has a B.S. degree in business from California State University, Northridge and has worked for many well-known software technology companies for nearly 30 years. For RMS, Mr. Gray works on various software components of the RiskLink product and the RiskOnline web site. Mr. Gray's experience includes user interface, database, and network programming.

Hurricane Project Responsibilities: Detailed design and implementation of upgrades to database, user interface, and Detailed Loss Model software components.

Nathalie Grima, Risk Quantification Researcher

Ms. Grima joined RMS in November 2004 as a financial modeler. Her responsibilities include development and quality assurance of new financial model related features. Prior to joining RMS, she was a mathematics graduate student at San Jose State University. Ms. Grima is a graduate of the University of Paris IX Dauphine with a degree in Mathematics.

Hurricane Project Responsibilities: Ms. Grima is involved in the design, documentation, and quality assurance of the financial model.

Prasad Gunturi, Former Vulnerability Engineer

Mr. Gunturi holds a M.E. degree in Structural Dynamics from the Indian Institute of Technology, Roorkee (formerly known as University of Roorkee), India. He earned the University Medal and Indian Service Engineers prize for Standing First Rank in his master’s program. Mr. Gunturi has over 4 years of professional experience in catastrophe risk modeling. His current focus is on the development of vulnerability models, inventory parameters of windstorm and flood perils in Europe.

Hurricane Project Responsibilities: Development of hurricane vulnerability models and vulnerability model of storm surge portion of the U.S. Hurricane model.

Surya Gunturi, Ph.D., Former Director

Dr. Gunturi holds B.S. and M.S. degrees in Civil Engineering from the Indian Institute of Technology in Madras, India. He earned the Standing First Rank in his master’s program. He holds a Ph.D. in Civil Engineering from Stanford University.

He was honored with a fellowship to the University of Stuttgart where he worked on non-linear dynamic analysis of structures. Dr. Gunturi has over 20 years experience as a researcher and project manager. At RMS, he has served as the Wind Hazard Modeling group lead, investigating worldwide wind hazards and developing analytical methods to predict wind field patterns, surge flooding, and the impact of extreme wind conditions. His current focus is on model implementation, where he leverages his extensive working knowledge of computer expert systems. Dr. Gunturi has published over 30 technical papers on structural engineering analysis and design and is a member of the American Society of Civil Engineers.

Hurricane Project Responsibilities: Hurricane model implementation.

Brent Hamstreet, Former Lead Software Engineer

Mr. Hamstreet has a B.S. degree in Computer Science from Santa Clara University. Mr. Hamstreet designs and implements software functionality for many aspects of RMS products and also provides guidance and leadership to other team members.

Hurricane Project Responsibilities: User interface design and implementation, data representation, and persistency.

Sherry Huang, Former Risk Quantification Researcher

Ms. Huang joined RMS in May 2003 as a financial modeler. Her responsibilities include development and quality assurance of new financial model related features. Prior to joining RMS, she was a senior actuarial analyst at Mercer Human Resources Consulting, a subsidiary of Marsh & McLennan Company. Ms. Huang is a graduate of the University of California at Berkeley with dual degrees in Economics and Statistics. She is working toward attaining her associateship in the Casualty Actuarial Society (ACAS).

Hurricane Project Responsibilities: Ms. Huang is involved in the design, documentation, and quality assurance of the financial model used in the RMS U.S. Hurricane model.

Sridhar Iyer, Lead Software Engineer

Mr. Iyer has a M.S. degree in Computer Science from West Virginia University, and a B.S. degree in Mechanical Engineering from Regional Engineering College, Trichy in India. For RMS, Mr. Iyer is primarily responsible for the detailed design and implementation of software components in the RiskLink Detailed Loss Model.

Hurricane Project Responsibilities: Detailed design and implementation of software components in the RiskLink Detailed Loss Model.

Amit Jain, Senior Software Engineer

Mr. Jain has a B.S. degree and a Masters degree in Computer Applications from Agra University, Agra, India. He is also a Microsoft and Brainbench certified Software Professional. For RMS, Mr. Jain is primarily responsible for the detailed design and development of the RiskLink reporting, data aggregation, and user-interface software components.

Hurricane Project Responsibilities: Build and maintain reports and underlying reporting engine software components.

Steve Jewson, Vice President, Model Development

Dr. Jewson has a Ph.D. in Climate Modeling from Oxford University, and Masters and Bachelors degrees in Mathematics from Cambridge University. He leads the development of climate hazard models at RMS, with responsibility for models for winter storms, hurricanes, and other tropical cyclones, tornado-hail-derecho, and flood. Previous to this role he ran the RMS weather derivatives business. Dr. Jewson has published a large number of articles on the mathematical modeling of weather risk, and is a frequent speaker at industrial and academic conferences. Prior to joining RMS, Dr. Jewson was an academic meteorologist and worked at the universities of Reading, Monash, and Bologna.

Hurricane Project Responsibilities: Oversees the modeling of the hurricane hazard.

Vikrant Kalhan, Former Lead Software Engineer

Mr. Kalhan has a B.S. degree in Computer Science from University of Pune, India and a Masters in Computer Applications degree from the Institute of Management & Technology, India. Mr. Kalhan joined RMS in 1997 and has been involved with designing and developing software for RiskLink, RiskBrowser, and RiskSearch products. For RiskLink, he is responsible for the detailed design and implementation of geocoding and geotechnical hazard lookup components.

Hurricane Project Responsibilities: Maintenance and upgrades to the core libraries and components.

Amit Kaura, Lead Software Engineer

Mr. Kaura has an M.S. in Computer Science from California State University, Sacramento and an M.S. in Applied Mathematics from the Indian Institute of Technology, Roorkee, India. He joined RMS in April 2004.

Hurricane Project Responsibilities: Provide software enhancements and fixes for various software components.

Sameer Khandekar, Former Senior Software Engineer

Mr. Khandekar has a B.S. degree in Electrical Engineering from the University of Pune, India. Mr. Khandekar's contributions focus on the user interface of the RiskLink product.

Hurricane Project Responsibilities: User interface design and implementation.

Atul C. Khanduri, Ph.D., Former Program and U.S. Hurricane Model Project Manager

Dr. Khanduri holds B.E. and M.E. degrees in Civil Engineering from the University of Roorkee (India) and a Ph.D. from the Center for Building Studies, Concordia University (Canada). During his tenure at RMS, Dr. Khanduri played a key role in developing hurricane vulnerability models as well as researching, consolidating and maintaining all vulnerability and inventory parameters related to wind risk models. Experienced in hurricane reconnaissance surveys, he was involved in developing mitigation models and strategies for dealing with natural hazards. While in Canada, on a Commonwealth Scholarship, Dr. Khanduri performed research on wind effects on buildings, using experimental and computerized modeling methods and on the application of Artificial Intelligence techniques to civil engineering. Dr. Khanduri has a broad-based experience of over 14 years in civil engineering design, research, teaching and risk assessment. He has numerous publications in technical journals and conferences and holds memberships of the American Society of Civil Engineers, Canadian Society for Civil Engineering and the American Association of Wind Engineering.

Hurricane Project Responsibilities: Former responsibilities included development and upgrade of hurricane vulnerability models as well as researching, consolidating and maintaining all vulnerability and inventory parameters related to wind risk models. He also previously served as the overall U.S. Hurricane model project manager.

Shree Khare, Ph.D., Weather Risk Modeler

Dr. Shree Khare completed his BSC in Honours Physics from the University of British Columbia and Ph.D. in Atmospheric and Oceanic Sciences from Princeton University. During his Ph.D., Dr. Khare specialized in data assimilation for optimal prediction of geophysical fluid flows. Most recently, Dr. Khare was a fellow in the mathematics institute at the National Center for Atmospheric Research. Dr. Khare is now working on development of a new U.S. Hurricane model.

Hurricane Project Responsibilities: Involved in the development and review of the hurricane windfields.

Eric Laszlo, Financial Modeler

Mr. Laszlo joined RMS in November 2005. His responsibilities include development and quality assurance of new financial model related features. Prior to RMS, Mr. Laszlo worked seven years at the global consulting company Milliman, Inc. Mr. Laszlo graduated from California Polytechnic University, Pomona, with a M.S. in mathematics. Prior to this he spent four years in the United States Army, 82nd Airborne Division.

Hurricane Project Responsibilities: Mr. Laszlo is involved in the design, documentation, and quality assurance of the financial model.

Philip D. LeGrone, P.E., CSP, Former Claims Research Director

Mr. LeGrone received his B.A. in Industrial Engineering from the University of Florida. Mr. LeGrone joined RMS in July of 2000 following an 11-year career in the field of property loss control with the Chubb Group of Insurance Companies. His areas of expertise include fire, wind, business interruption, and flood protection for large industrial and commercial occupancies. As the Claims Research Director, he is responsible for claims data collection and research for all perils modeled by RMS. In addition, he has been involved with the design and development of the earthquake sprinkler leakage (EQSL), Terrorism, Builders Risk, and Offshore Platforms models.

Hurricane Project Responsibilities: Performed field reconnaissance work and claims data collection and analysis on Hurricanes Opal, Georges, Isabel, Charley, Frances, Katrina, Rita, and Wilma, as well as Tropical Storm Allison.

Jason Lin, Ph.D., Former Principal Scientist

Dr. Lin obtained his doctorate in 1988 in Aeronautical Engineering from Nanjing University of Astronautics and Aeronautics, China. He joined the RMS modeling team in January 2005. His responsibilities include developing a second generation engineering science based hurricane vulnerability model. Prior to joining RMS, he was a Senior Specialist in wind engineering at RWDI Group, Inc., Ontario, Canada, dealing with wind tunnel studies of wind effects on structures, as well as a number of condominium buildings in Florida. He also worked at Applied Research Associates, Inc. (ARA) in North Carolina as a Principal Scientist for six years in wind risk modeling, including the development of the HAZUS wind module.

Hurricane Project Responsibilities: Assists in the update of content-building damage relationship based on data from the 2004 hurricanes.

Chang Liu, Former Senior Software Engineer

Dr. Liu has B.S. and M.S. degrees in Civil Engineering from WuHan University in China, and a Ph.D. in Civil Engineering from McGill University of Canada. Before he joined RMS in 1999, Dr. Liu had worked in Dames & Moore as a Project Engineer/Risk Analyst and also worked as a research engineer/software engineer at J.H. Wiggins Company. For RMS, Dr. Liu works as a primary software developer of the financial model component of the RiskLink product.

Hurricane Project Responsibilities: Maintains and enhances the financial modeling software components.

Paul MacManus, Ph.D., Former Senior Financial Modeler

Dr. MacManus performed his undergraduate work in Ireland and obtained his Ph.D. at Yale University. He joined RMS in March 2005. His primary responsibilities are researching new methods and models for inclusion in the RMS financial model and the implementation of these new features. Prior to joining RMS he was a professor of mathematics at the University of Texas at Austin, the University of Edinburgh, and the National University of Ireland among other institutions.

Hurricane Project Responsibilities: Dr. MacManus has been developing and testing the model for aggregate annual deductibles (instead of occurrence based deductibles) for use in the RMS U.S. Hurricane model.

Roberta Mantovani, Catastrophe Response Modeller

Dr. Mantovani holds a University Degree in Physics from the University of Rome "Tor Vergata" and a Ph.D. in Physics from the University of Bologna where she studied moist-orographic extratropical cyclogenesis and symmetric instability producing precipitation bands. Dr. Mantovani joined RMS' Model Development team in 2007 after 4-years in the European Space Agency as scientific expert of MIPAS instrument flying on the ENVISAT satellite, and after 2-years experience in the development of meteorological systems for air traffic control.

Hurricane Project Responsibilities: Involved in the development of catastrophe response for hurricanes.

Scott Martin, Ph.D., Former Senior Software Engineer

Dr. Martin has a B.S. degree in Geology from the University of California at Los Angeles, and M.S. and Ph.D. degrees in Structural Engineering from the University of California at Irvine. For RMS, Dr. Martin is responsible for maintaining and updating the RiskLink Detailed Loss Model software.

Hurricane Project Responsibilities: Updating the Detailed Loss Model software.

Manabu Masuda, P.E., Senior Vulnerability Engineer

Mr. Masuda has a B.S. and an M.S. degree in Engineering from Kobe University, and a Ph.D. in Civil Engineering from Stanford University. For RMS, Mr. Masuda is engaged in risk modeling for U.S. Workers Compensation and Japan Earthquake. He is also responsible for the maintenance of complex relational databases, client services, and QA of various data layers.

Hurricane Project Responsibilities: QA of the vulnerability module.

Rohit P. Mehta, Lead Implementation Engineer

Mr. Mehta has B.E. degree in Civil Engineering from Delhi College of Engineering, India and a M.S. in Statistics from California State University Hayward. He joined RMS in 2000 and is primarily responsible for implementation, validations and data management for various models. Prior to joining RMS, he gained four years experience in the testing, validation, and vulnerability implementation for various models.

Hurricane Project Responsibilities: Implementation, validation, testing, quality assurance, and data management.

Charles Menun, Senior Project Director

Dr. Menun joined RMS as a Lead Vulnerability Engineer in 2005 after spending five years as a faculty member in the Department of Civil and Environmental Engineering at Stanford University, where his research focused on the development of probabilistic methods for safety and performance assessment in earthquake engineering. Prior to joining Stanford, he worked for six years as a licensed structural engineer in Canada, where he supervised the structural design of residential and commercial high-rise buildings in the Greater Vancouver area. His responsibilities at RMS include overseeing the development of hurricane and earthquake vulnerability models. Dr. Menun holds Bachelor's and Master's degrees in Civil Engineering from the University of British Columbia and earned his doctoral degree in Structural Engineering from the University of California at Berkeley.

US Hurricane Project Responsibilities: Dr. Menun was responsible for the development and calibration of the storm surge and wave damage curves in RMS' current U.S. Hurricane vulnerability model and is overseeing an upgrade of the U.S. Hurricane wind and storm surge vulnerability models scheduled to be released in 2010.

Craig Miller, Ph.D., Assistant Professor[37]

Dr. Miller holds B.E. (Hons) and M.E. degrees in Mechanical Engineering from the University of Auckland, New Zealand, and a Ph.D. in Engineering Science from the University of Western Ontario, Canada. Dr. Miller joined RMS in September 1997. During his time at RMS, Dr. Miller was primarily responsible for the development of surface wind field models for the modeling of risk due to both tropical and extra-tropical cyclones. This included the characterization of the effects of changes in the surface roughness and wind speed averaging times, as well as the effects of topography on surface wind speeds, both modeled and observed. Dr. Miller was also involved in post storm damage surveys following Hurricane Georges in Puerto Rico in 1998, and windstorm Anatol in Denmark in 1999. Prior to joining RMS Dr. Miller worked as a Research Fellow at the Building Research Establishment in England on a project examining the exposure of U.K. Meteorological Office anemograph sites, and the resulting impact on design wind speeds for the United Kingdom. He is a member of the Wind Engineering Society, the Royal Meteorological Society, and the American Meteorological Society.

Dr. Miller has consulted to RMS since leaving RMS in November 2002 to take up a faculty position associated with the Alan G. Davenport Wind Engineering Group in the Department of Civil and Environmental Engineering at the University of Western Ontario, Canada.

Hurricane Project Responsibilities: Development of wind field models for the assessment of risk and development of modeled effects including the effects of ground roughness changes and topography on the wind field structure.

Gilbert Molas, Ph.D., Lead Engineer

Dr. Molas graduated Cum Laude from the University of the Philippines, with a B.S. degree in Civil Engineering. He received his M.S. and Ph.D. in Civil Engineering from the University of Tokyo in 1995. Dr. Molas' primary technical duties are to develop earthquake and windstorm stochastic models. He is also actively involved in several technical aspects of the RMS worldwide risk models including calibration, validation, and product implementation. He has been a major contributor to the development of earthquake and windstorm models for the United States and Japan, including securitization projects for these models. While in Japan on a Monbusho Scholarship, Dr. Molas worked on Earthquake Engineering and Disaster Mitigation research, developed new earthquake ground motion attenuation relations, and damage estimation techniques using artificial intelligence (neural networks). Prior to joining RMS, Dr. Molas was a member of the faculty at the Department of Civil Engineering, University of the Philippines, teaching structural analysis and design, and probability and statistics. He has worked on catastrophe risk model development for more than ten years.

[37] Consultant to RMS since November 2002

Hurricane Project Responsibilities: (1) Advisor on science and technical issues; and (2) Convergence studies.

Guy Morrow, S.E., Senior Vice President, Model Development

Mr. Morrow holds a B.S. degree in Civil Engineering from the University of Illinois and a M.S. in Structural Engineering from the University of California in Berkeley. He is a registered Civil and Structural Engineer in the State of California. Mr. Morrow has over twenty years of experience in the field of seismic analysis, structural design and risk assessment. Prior to joining RMS, Mr. Morrow was an associate in the structural engineering firm Degenkolb Engineers in San Francisco. Since joining RMS in 1994, Mr. Morrow has performed risk assessments of major commercial and manufacturing facilities located throughout the world. He has participated in and led the development of numerous catastrophe risk models. He currently leads the model development team and oversees science and engineering related aspects of catastrophe risk model development.

Hurricane Project Responsibilities: Advisor on science and technical issues.

Chris Mortgat, Ph.D., Vice President, Principal Scientist

Dr. Mortgat received his Ph.D. in Civil Engineering, an Engineer's degree in Geotechnical Engineering, and a M.S. in Structural Engineering from Stanford University, and has a B.S. degree in Civil Engineering from Tennessee Technological University. Dr. Mortgat has a broad background in earthquake engineering that ranges from structural analysis for buildings and earth dams to the development of seismic hazard maps. Dr. Mortgat has developed a unique Bayesian risk analysis methodology and has studied earthquake response spectrum shapes and their attenuation. He has directed or participated in major seismic risk analysis projects for Costa Rica, Nicaragua, Alaska, and Algeria. Following the 1980 Algerian earthquake, he participated as a member of the Stanford University research team and the Earthquake Engineering Research Institute's reconnaissance team in Algeria. He has published numerous articles and reports in these areas. Dr. Mortgat has been responsible for civil/structural design review at several nuclear power plants in areas such as procedure and criteria review, structural dynamics modeling, steel and concrete design, and design of suspended commodities. Recently, Dr. Mortgat has been involved in the severe accident assessments of advanced light water reactor designs. He has more than 25 years experience in catastrophe risk modeling.

Hurricane Project Responsibilities: Advisor on science and technical issues.

Jonathan Moss, Financial Model QA Manager

Mr. Moss joined RMS in August 1998, taking a position in the Quality Assurance department. In December of 1998, he moved into the newly formed Actuarial and Financial Modeling unit, where he added RiskLink financial model design and weather derivative studies to his existing duties. He is currently a Lead Risk Quantification Researcher. Prior to RMS, Mr. Moss worked in the actuarial department for eight years at Fireman's Fund Insurance Companies in Novato, CA. Mr. Moss graduated from St. Norbert College with a B.A. in mathematics and also spent four years doing statistics graduate work at the University of Arizona in Tucson, Arizona.

Hurricane Project Responsibilities: Mr. Moss leads the quality assurance for the financial model and is involved in the design of the financial model used in the RMS U.S. Hurricane model.

Robert Muir-Wood, Ph.D., Executive Vice President, Chief Research Officer

Dr. Robert Muir-Wood has developed probabilistic catastrophe models for earthquake, tropical cyclone, volcano, river flood, and storm surge hazards in Japan, Australia, the Caribbean, and the U.K. Most recently he has led the project to build a new scientific foundation for European windstorm loss modeling. He has published 40 scientific papers, written more than 100 articles and reviews, lectured to audiences from the Soviet Ministry of Atomic Energy to the Royal Geographical Society Christmas Lecture, run courses on catastrophe risk for Lloyds of London and is the founding editor of the European Journal of Geo-sciences: Terra Nova. He has also published six books, and has been active in his field for more than 20 years.

Hurricane Project Responsibilities: Advisor on science and technical issues.

Hemant Nagpal, Former Engineering Analyst

Mr. Nagpal has a B.E. degree in Civil Engineering from Delhi College of Engineering, India. He joined RMS in 2004 and was primarily responsible for implementation, validation, and data management for various models. Prior to joining RMS, he gained four years experience in the testing, validation, and supporting the development of various risk models.

Hurricane Project Responsibilities: Mr. Nagpal was involved in the implementation, validation, testing, quality assurance, data management, and preparing material for regulatory submissions.

Roopa Nair, Analyst, RMSI

Ms. Nair has 6 months of experience in Catastrophe Risk Model QA. She has done her M.S. and B.S. degree in Statistics from Delhi University, India. She was involved in the creation of regression datasets for testing in RiskLink and QA of tool for Aggregate Loss Model during its development phases. She is currently involved with Europe EQ model QA.

Hurricane Project Responsibilities: Ms. Nair was involved in model implementation and QA of geocoding, hazard and vulnerability files.

Kannan Narayanan, Data Architect/Senior Software Engineer

Mr. Kannan joined RMS in May 2004 as Senior Software Engineer. His responsibilities include metadata management, business semantics, data modeling, and data access strategy/implementation and other software architecture tasks. Prior to joining RMS, he worked as Senior Developer/Architect at Commira, a company engaged in building a Retail ERP software solution. He is a graduate in Finance and Commerce from Chennai, India and also holds two additional post-graduate professional qualifications as an Associate Chartered Accountant and Cost and Management Accountant from India.

Hurricane Project Responsibilities: Mr. Narayanan is involved in database design and data access.

Terrance Ng, Former Senior Software Engineer

Mr. Ng has a M.S. degree in Computer Science from the University of Illinois at Chicago. Mr. Ng joined RMS in 2002. Since then, Mr. Ng has worked on various software products. His responsibility includes developing distributed server applications, geocoding and geotechnical hazard lookup components for the RiskLink, RiskBrowser, and RiskSearch products.

Hurricane Project Responsibilities: Detailed design and implementation of the geocoding components.

Matthew Nielsen, Product Manager, Americas Region

Mr. Nielsen holds a M.S. degree in Atmospheric Science from Colorado State University and a B.A. degree in Physics from Ripon College in Wisconsin. He supports the product marketing and business development activities for RMS' U.S. and Canada climate hazard peril models and derivative products, and has served as lead contact for RMS in the submission to the Florida Commission on Hurricane Loss Projection Methodologies. He is a member of the American Meteorological Society (A.M.S.) and has authored and presented technical papers at several A.M.S. conferences. He has been with RMS since September of 2005.

Hurricane Project Responsibilities: Support of U.S. Hurricane model management.

Adam O'Shay, Ph.D., Former Senior Tropical Cyclone Modeler

Dr. O'Shay has a B.S. degree in Atmospheric Science from Cornell University and a M.S. and Ph.D. from the Florida State University. He joined RMS in June 2005 as a member of the Climate Hazard and Model Development team, to work on the development of the RMS Hurricane model. Prior to joining RMS, Dr. O'Shay performed research on numerical modeling of hurricane recurvature as well as climate research into the mechanisms that maintain tropical dynamics within the upper troposphere.

Hurricane Project Responsibilities: Dr. O'Shay is involved in the implementation of the activity rates and model parameters represented within the RMS model.

Narvdeshwar Pandey, Senior Analyst, RMSI

Mr. Pandey has over five years of experience in RMSI. He has completed M.S. in Future Studies and Planning from Devi Ahilya University, Indore, India and another M.S. in Mathematics from Gorakhpur University, India. He was involved in creating regression dataset for testing in RiskLink, Profile generation and internal tool development for creating regression dataset. He has also performed model QA for India Earthquake model and currently involved with Europe EQ model QA.

Hurricane Project Responsibilities: Mr. Pandey was involved in model implementation and QA of geocoding, hazard and vulnerability files.

Ghanshyam Parasram, Former Software Manager, Business Services

Mr. Parasram has a bachelor’s degree in Mechanical Engineering from Jawahar Lal Nehru Technological University, India. He has over 10 years of experience in design and development of software applications using object oriented technologies. Prior to joining RMS in 2000, Mr. Parasram worked as a Development Manager at Liquid Software Inc., building enterprise application integration systems that provide integration solutions to PeopleSoft and SAP. Prior to that, he worked at CMC India, developing financial applications for the banking industry. At RMS, Mr. Parasram's primary role is manager of software development for the application logic and workflow layer in RiskLink and RiskBrowser products.

Hurricane Project Responsibilities: Managing software development for the application logic and workflow layer in RiskLink.

Rahul Patasariya, Risk Engineer, RMSI

Mr. Patasariya has 9 months of experience in Catastrophe Risk Model QA in RMSI. He graduated in Civil Engineering from Indian Institute of Technology, Roorkee, India. He was involved in creation of regression dataset for testing in RiskLink and QA of tool for Aggregate Loss Model during its development phases. He is currently involved with Europe EQ model QA.

Hurricane Project Responsibilities: Mr. Patasariya was involved in model implementation and QA of geocoding, hazard and vulnerability files.

Sunil Patil, Lead Software Engineer

Mr. Patil has a B.S. degree in Electrical Engineering from the University of Pune, India. Working with RMS for approximately five years, Mr. Patil's experience focuses on the user interface of the RiskLink product.

Hurricane Project Responsibilities: Detailed design and implementation of enhancements to the data entry and results display screens.

Thankasala Prasanna, Lead Software Engineer

Mr. Prasanna has a B.S. degree in Aerospace Engineering from the Indian Institute of Technology, and a M.S. degree in Aerospace Engineering from Texas A & M University. For RMS, Mr. Prasanna is responsible for the detailed design and implementation of upgrades to the geocoding, geotechnical hazard lookup, and financial components of RiskLink.

Hurricane Project Responsibilities: Detailed design and implementation of upgrades to the geocoding, geotechnical hazard lookup, and financial components.

Mohsen Rahnama, Ph.D., Vice President, Modeling Vulnerability Practice

Dr. Rahnama earned his M.S. degree, Engineer's degree, and doctorate degree from Stanford University specializing in earthquake and structural engineering. Dr. Rahnama is Vice President of Engineering and Model Development. He leads the vulnerability practice team and is responsible for vulnerability development of all peril models including earthquake, hurricane, tornadoes, blast and explosion. He has over 19 years of experience in the field of earthquake ground motion, seismic structural analysis and design, building performance evaluation, catastrophe modeling and risk assessment. He was the main architect for development and implementation of response spectral methodology in the new U.S. earthquake model. He has played a major role in the development of the Industrial Facilities model that offers detailed modeling capability of high-valued industrial facilities for both hurricane and earthquake perils in all regions modeled by RMS. He is currently involved in research on the characteristics of earthquake ground motion parameters and performance-based design of structures.

Hurricane Project Responsibilities: Advisor on development and upgrade of hurricane vulnerability and inventory models.

Priya Rajendran, Senior Project Manager

Ms. Rajendran has a B.S. degree in Computer Science from Bharathiyar University.

Ms. Rajendran has worked as a project manager with i2 Technologies managing the data management products for 3 years before joining RMS in September 2002. For

RMS, Ms. Rajendran has worked as a project manager in the application development team.

Hurricane Project Responsibilities: Planning, scheduling and maintaining project plans.

John Reed, Former Senior Vice President, Product Development

Mr. Reed has a B.S. degree in Computer Science and an M.B.A., both from the University of Michigan. He also has a M.S. degree in Medical Informatics from Stanford University's Medical School. Mr. Reed joined RMS in 1993 as IRAS Product Manager. He managed a number of projects in both the Product Development and Quality Assurance departments. Before joining RMS he was Director of Development/Operations Manager for Greenleaf Medical Systems, as well as a development manager and an international software marketing liaison for Hewlett Packard. A long-standing member of the Healthcare Information Management Systems Society and the American Medical Informatics Association, Mr. Reed has written and presented papers on healthcare technology management and is active in both organizations.

Hurricane Project Responsibilities: Software implementation, testing and quality assurance, and reliance management.

John Reiter, Vice President, Software Core Products

Mr. Reiter has a B.S. degree in Mathematics and Computer Science from the University of Illinois at Urbana-Champaign and a M.S. degree in Computer Science from the same university. Mr. Reiter has over 20 years of experience in developing commercial software tools for the analysis of insurance and other financial risk. Prior to joining RMS in 1994, Mr. Reiter worked for over 10 years as a software developer at Syntelligence, Inc., building systems that provide underwriting advice to the property and casualty insurance industry and loan risk analysis for the banking industry. At RMS, Mr. Reiter's primary role is manager of all software development for the RiskLink, RiskBrowser, and RiskOnline products. Mr. Reiter is a member of the Association for Computing Machinery and has authored several software-related publications.

Hurricane Project Responsibilities: Management of software design and implementation.

Rhoderick Rivera, Fulfillment/RiskLink QA/Former Build Engineer

Mr. Rivera joined RMS in June of 2005, taking a position as a Configuration Release Engineer. Currently he is handling order fulfillment and QA duties. He graduated from the University of Illinois, Urbana-Champaign with a degree in Computer Engineering. Previously he has worked 2 years as a hardware engineer for Arise Computer and 2.5 years as an account manager at Washington Mutual.

Hurricane Project Responsibilities: Mr. Rivera created the RiskLink 6.0a Software and Data installation packages. He also handled fulfillment of client orders.

Agustín Rodríguez, Former Senior Vulnerability Engineer

Mr. Rodríguez joined RMS in July 1999 as a model developer. His responsibilities include development and implementation of all peril models, including windstorm, tornado, earthquake, and terrorism. He was responsible for developing and implementing the recent update of the Australia Cyclone vulnerability model. Mr. Rodriguez joined RMS after earning his M.S. degree from the University of California at Berkeley and his B.S. degree from Stanford University, both in Structural Engineering.

Hurricane Project Responsibilities: Development and improvement of hurricane vulnerability models.

Mitch Sattler, Vice President, Public Policy

Mr. Sattler is a Vice President of Public Policy with responsibility for RMS' interactions with regulators and public policy makers. In 1994 Mr. Sattler joined RMS as a consultant, and in 1995, was responsible for opening the Midwest Regional Office. During his tenure at RMS, Mr. Sattler has managed several account teams in our Client Development organization including the Midwest Region and the Large Commercial Industry Practice Group. In December 2005, Mitch Sattler was appointed to lead the newly formed Public Policy Group.

Prior to joining RMS, he worked in the insurance industry performing catastrophe management and modeling functions. Mr. Sattler worked in property pricing, ceded reinsurance, and product management positions for more than nine years. While in the insurance industry he was one of the original users of IRAS™. Mr. Sattler received a degree in Business Administration from the University of Arkansas at Little Rock, with a major in Management, and a M.S. in Statistics from Louisiana State University.

Hurricane Project Responsibilities: Oversees RMS' public policy group which is responsible for RMS' submission to the FCHLPM. Specifically, he is responsible for overall completeness and accuracy of the submission.

Pooja Sayal, Assistant Project Manager, RMSI

Ms. Sayal has 6 years of experience in Catastrophe Model development, implementation and QA in RMS/RMSI. She graduated in Civil Engineering from Delhi College of Engineering, New Delhi, India.

She was involved in developing historical storms windfield and their reconstruction. She also supported the development of the surface roughness data and windfield for tropical and extra-tropical cyclones. She also defined methodology for creating regression dataset for testing in RiskLink, defined specifications for internal tools for Aggregate loss model generation & aggregate hazard generation. She has also performed detailed model QA for India Earthquake model and currently involved with Europe EQ model QA.

Hurricane Project Responsibilities: Ms. Sayal was involved in model implementation and QA of geocoding, hazard and vulnerability files.

Afsal Seyed, Lead Release Engineer

Mr. Seyed has a B.S. degree in Computer Science and Engineering from Karnatak University, India and a B.S degree in Mathematics from Calicut University, India.
Mr. Seyed joined RMS in February 2007 and is working as the Lead Release Engineer primarily responsible for the major and maintenance release works of the various RMS catastrophic risk model solutions. Prior to working at RMS, Mr. Seyed has worked extensively in IP Telephony, Biotechnology and Data Storage solutions areas in top tech companies.

Hurricane Project Responsibilities: Involved with design, implementation and release of the RMS risk model software installers and also to provide solutions to enhance the installation technology and deployment.

Fei Sha, Ph.D., Senior Financial Modeler

Dr. Sha joined RMS in February 2007. Her responsibilities include research, maintenance, and development of the financial model used in RMS catastrophe models. Prior to joining RMS, Dr. Sha worked for three years at Allstate Insurance Co., first in the research division in Northbrook, IL and later in the Allstate Research and Planning Center in Menlo Park, CA. Dr. Sha holds a Ph.D degree in economics from the University of Kansas.

Hurricane Project Responsibilities: Dr. Sha is involved in the design, documentation, and quality assurance of the financial model.

Hemant Shah, President and CEO

Hemant Shah is President and CEO of Risk Management Solutions (RMS). Since co-founding RMS in 1989, Hemant has become widely recognized within the global insurance industry as a proactive and influential leader. In 2005 and 2006 Hemant was surveyed to be amongst the "100 Most Powerful People in the Insurance Industry – North America" by the *Insurance Newscast*. In 2002 he was recognized as one of "35 Rising Stars" by *Business Insurance*; in 2000, Hemant was identified as one of the "Leaders of the Future" by *Global Reinsurance.* He received his B.S. degree in Civil Engineering and M.S. degree in Engineering Management from Stanford University. Hemant serves as a Trustee to the Board of the University Corporation of

Atmospheric Research (UCAR), located in Boulder, Colorado. UCAR manages the National Center for Atmospheric Research (NCAR), the focal point of U.S. government-sponsored research for understanding the behavior of the atmosphere and related systems of the global environment. He also serves on the Board of Overseers of St. John's School of Risk Management and Actuarial Science (College of Insurance), is a Director of the RAND Center for the Study of Terrorism Risk Management Policy, a Director on the Board of RAND's Institute for Civil Justice, and a Director of the Singapore-based Institute for Defense and Strategic Studies. Hemant is a member of the Aspen Institute's prestigious Henry Crown Fellowship Program, which seeks to develop our next generation of community-spirited leaders, providing them with the tools necessary to meet the challenges of corporate and civic leadership in the 21st century.

Hurricane Project Responsibilities: Advisor on science and technical issues.

Mohan P. Sharma, Ph.D., Former Principal Engineer

Dr. Sharma has a B. Tech. from the Indian Institute of Technology, New Delhi, India and a M.S. degree and Ph.D. from Stanford University. Dr. Sharma has over 15 years professional experience in teaching, structural analysis and design, natural hazard modeling, and catastrophe modeling. He has taught undergraduate and graduate courses at the Institute of Engineering, Kathmandu, Nepal, and Santa Clara University, Santa Clara, CA. At RMS, Dr. Sharma led teams in the development of hazard and vulnerability models for hurricanes, tornado and hail, and extratropical storms.

Hurricane Project Responsibilities: Former lead developer of the storm surge module of the U.S. Hurricane model. Analyzed historical hurricane database for obtaining statistics on hurricane parameters for use in the simulation of the stochastic event set.

Chessy Q. Si, Senior GIS Engineer

Ms. Si holds a B.S. degree in Economic Geography and Urban Planning from Beijing University and a Post-Graduate Diploma in Geographic Information Systems (GIS) from the Institute for Housing Studies, the Netherlands. She received her M.A. in GIS and MRP in Regional Planning from State University of New York, Albany. Prior to joining RMS, she practiced urban planning for five years and worked as a GIS Specialist with various public and private agencies. Ms. Si has 10 years experience with GIS application, spatial data analysis, and digital cartography. She is currently involved in several RMS projects and is responsible for the RMS spatial data warehouse.

Hurricane Project Responsibilities: GIS software implementation.

Rajesh K. Singh, Ph.D., P.E., Senior Director, Model Development Operations

Dr. Singh received his Ph.D. from Stanford University, Master's degree from the University of British Columbia, and Bachelor's degree from IIT Kanpur, all in Civil Engineering. Dr. Singh has worked on the development and implementation of loss assessment models, design and implementation of engineering databases, and creating derivative data layers for use with aggregate exposure and reinsurance applications. As a principal engineer within the Model Development Operations group at RMS, and lead for the engineering QA team, Dr. Singh is responsible for quality of the model implementation with RiskLink. Prior to RMS, Dr. Singh worked as a design engineer at J. K. M. Associates, a structural engineering consulting firm in Vancouver, Canada, on the seismic analysis and design of high-rise buildings. Dr. Singh is a registered Professional Engineer (P.E.) in California, and a member of the American Society of Civil Engineers.

Hurricane Project Responsibilities: Model implementation and Engineering quality assurance.

Jayanta Singha, Former Senior Modeler

Mr. Singha graduated in Civil Engineering from Govind Ballabh Pant University in Pantnagar, India. He joined RMS London in April 2003. Mr. Singha has five years experience with a consulting engineering firm on various water resources, irrigation and highways projects and over five additional year's experience supporting the development and testing of hurricane models.

Hurricane Project Responsibilities: Mr. Singha's focus is on wind model development and testing, client support, and preparing material for regulatory submissions, as well as being involved in the research and development of new models.

Jayant Srivastava, Manager, Business Services Group

Mr. Srivastava has an M.S in Computer Science from the Institute of Management and Technology, India. For RMS, Jayant is managing the Business Services Development Group and develops software enhancements and fixes for various functionalities of core applications.

Hurricane Project Responsibilities: Enhancements and maintenance of databases.

Beth Stamann, Senior Documentation Specialist

Beth joined RMS in August of 1995. She worked within the Client Development Organization until October 2007 when she moved to the Public Policy Group as Senior Documentation Specialist.

Hurricane Project Responsibilities: Prodution of RMS Submission

Pane Stojanovski, Ph.D., Vice President, Model Development Operations

Dr. Stojanovski holds M.S. and Ph.D. degrees from the University of Skopje, Macedonia. He has over 20 years of research, practicing, and teaching experience in the field of earthquake and structural engineering, catastrophe loss modeling, and development of natural catastrophe loss estimation models. Before joining RMS he was professor at the Skopje University, Macedonia. Dr. Stojanovski was also a visiting Fulbright scholar/professor at the Blume Earthquake Engineering Center at Stanford University. Dr. Stojanovski is in charge of the model development operations at RMS. He also oversees the implementation and productization of all natural catastrophe models developed by RMS.

Hurricane Project Responsibilities: Operational oversight and resource utilization for the preparation of the submittal to the FCHLPM.

William Suchland, Vice President, Software Applications

Mr. Suchland has a B.A. degree in Geography/Computer Assisted Cartography from the University of Washington in Seattle, Washington. He has over 25 years of professional experience in software design, development, and technical project management. Prior to joining RMS in 1996, Mr. Suchland worked for over 15 years as a software developer and software development manager in the at geo-demographics industry, building consumer marketing analysis systems and the supporting GIS and mapping capabilities. At RMS, Mr. Suchland's primary role is manager of software development for the user interface and business logic groups for the RiskLink and RiskBrowser products.

Hurricane Project Responsibilities: Management of software design and implementation.

Joel Taylor, Public Policy Analyst

Mr. Taylor has a B.S. degree in Mathematics from Bradley University, Peoria, Illinois. He joined RMS in April 2007. After completing the risk analyst program, he is now a part of the Public Policy Group.

Hurricane Project Responsibilities: Assisting in actuarial and statistical form generation.

James Tomcik, Former Vice President, Product Quality

Mr. Tomcik has a B.S. degree in Computer Science from the University of Akron. He has over 15 years experience with information technology, product support, and quality assurance. Prior to joining RMS in 2000, Mr. Tomcik worked for 13 years at the corporate offices of Roadway Express, Inc. based in Akron, Ohio. His last position at Roadway Express included responsibility for software quality assurance and technical product support. At RMS, Mr. Tomcik is responsible for the product quality of the tools and software that RMS provides.

Hurricane Project Responsibilities: Product quality assurance and release management.

Christine Wallinger, Senior Analyst, Public Policy

Ms. Wallinger has a B.S. degree in Mathematics from Bradley University, Peoria, Illinois. Within RMS, her responsibilities include regulatory support and solutions development. She joined RMS in October 2005 and, after completing a year in the risk analyst program, she is now a senior analyst for the public policy group.

Hurricane Project Responsibilities: Actuarial and statistical form generation.

Jianmin Wang, Senior Software Engineer

Ms. Wang is primarily responsible for the detailed design and implementation of enhancements to the RiskLink Detailed Loss Module (DLM) software.

Hurricane Project Responsibilities: Detailed design and implementation of enhancements to RiskLink-DLM.

William Andrew Wheeler, Software Engineer

Mr. Wheeler has an M.A. degree in Mathematics from Portland State University. At RMS, Mr. Wheeler works primarily on the reporting components of the RiskLink product.

Hurricane Project Responsibilities: Develop and maintain reports.

Fan Wu, Ph.D., Senior Software Engineer

Dr. Wu has a B.S. and a M.S. degree in Mechanical Engineering from Shanghai Jiao Tong University, a M.S. degree in Civil Engineering from the University of New Mexico, and a Ph.D. degree in Computations and Mechanics in Mechanical Engineering from Stanford University. She has also received a Certificate of Microsoft Windows Development from University of California Extension. At RMS, Ms. Wu is involved in the software development of the Detailed Loss Model (DLM) component of the RiskLink product for all perils.

Hurricane Project Responsibilities: Detailed design and implementation of the Detailed Loss Model software components.

Yen-Tin Yang, Senior Model Quality Assurance Engineer

Ms. Yang received an M.S. degree in Management Science & Engineering from Stanford University, and an M.S. in Structural Engineering and B.S. in Civil Engineering degrees from National Taiwan University. Ms. Yang joined RMS in January 2005. She is responsible for model implementation quality assurance and data validation. Prior to RMS, Ms. Yang worked on product verification at Autodesk, Inc.

Hurricane Project Responsibility: Model implementation quality assurance, testing, and validation.

Ying-Jen Yen, Senior Software Engineer

Mr. Yen has a B.S. in Engineering from National Central University in Taiwan and an M.S.E.E. in Computer Engineering from Rice University in Houston, TX. He also holds an Executive MBA from the University of Southern California. For RMS, Mr. Yen is primarily responsible for the detailed design and development of RiskLink peril model and analysis software components. Prior to joining RMS in July 2006, Mr. Yen worked for Countrywide Financial in Simi Valley, CA in a software development leadership role.

Hurricane Project Responsibilities: Build and maintain RiskLink peril model and analysis software components.

Michael Young, Senior Director

Mr. Young holds a M.Sc. from the University of Western Ontario in Canada where he studied wind loading on low rise buildings. He was worked in commercial wind tunnel laboratories doing studies on wind loads for a variety of buildings. Before joining RMS, he worked as a modeler at Applied Research Associates on hurricane vulnerability risk models. He was involved in the development of the HAZUS-MH software for hurricane risk assessment and studies on mitigation cost-effectiveness for building codes, such as the 2001 Florida Building Code and the North Carolina Building Code. Mr. Young has conducted post-hurricane reconnaissance visits after Hurricanes Bonnie (1998), Isabel (2003), Charley (2004), Frances (2004), Ivan (2004), and Jeanne (2004). He is a member of the American Society of Civil Engineers and the American Association of Wind Engineers.

Hurricane Project Responsibilities: Development and improvement of hurricane vulnerability models.

Ji Zhang, Software Engineer

Ms. Ji Zhang joined RMS in June 2006 as a software engineer in Software Peril Model Services. She is responsible for software development for several peril models.

She has a M.S. degree in Computer Science from California State University, East Bay and B.S degree in Mathematics from Xiamen University.

Hurricane Project Responsibilities: Maintain, develop and test peril model software.

Liang Zhang, Wind Vulnerability Engineer

Ms. Zhang earned her Masters degree in Civil/Structural Engineering from the Florida Institute of Technology in 2003, and her B.S. from Northern Jiaotong University in Beijing, China where she majored in Construction Engineering and Management. During her graduate study she helped develop the vulnerability components of the Florida Department of Insurance's Public Hurricane Model. Since joining RMS in 2004, Ms. Zhang has conducted post-hurricane reconnaissance surveys and contributed to the analysis of claims and implementation of upgrades to RMS' U.S. Hurricane vulnerability models for mobile homes.

Hurricane Project Responsibilities: Development/improvement of hurricane vulnerability models.

Christine Ziehmann, Director, Product Management Americas

Dr. Ziehmann received her Ph.D. in meteorology from the Free University of Berlin in 1994 where she also studied for her bachelor's and master's degrees in meteorology. Dr. Ziehmann joined RMS in 2001 from the Institute of Physics at the University of Potsdam (Max-Planck-Institute for Nonlinear Dynamics), Germany, where she held a post doc position with main research interest the predictability of weather and climate and nonlinear systems in general. Dr. Ziehmann was also a lecturer at the University of Potsdam and previously the University of Hamburg in theoretical meteorology, atmospheric boundary layer meteorology and non-linear time series analysis. In October 2007 Dr. Ziehmann was appointed as product manager for the Atlantic Hurricane model after having various roles in RMS' product management and weather derivatives business units. She is a member of the German Meteorological Society (DMG).

Hurricane Project Responsibilities: Advisor on science and technical issues.

G-2.2.b Identify any new employees or consultants (since the previous submission) working on the model.

Employees new to the development and model management of the RMS U.S. Hurricane model include Ms. Li Cao, Dr. Katie Coughlin, Dr. Sandra Cruze, Ms. Alpana Das, Dr. Steve Jewson, Mr. Amit Kaura, Dr. Shree Khare, Mr. Eric Laszlo, Dr. Roberta Mantovani, Ms. Roopa Nair, Mr. Narvdeshwar Pandey, Mr. Rahul Patasariya, Ms. Priya Rajendran, Mr. Rhoderick Rivera, Mr. Afsal Seyed, Dr. Fei Sha, Mr. Jayant Srivastava, Ms. Beth Stamann, Mr. Joel Taylor, Ms. Ji Zhang and Dr. Christine Ziehman.

Their education, employment status, tenure, and relevant experience are included in disclosure G-2.2a.

G-2.2.c ***Provide visual business workflow documentation connecting all personnel related to model design, testing, execution, maintenance, and decision-making.***

Figure 5 shows a typical workflow diagram used at RMS.

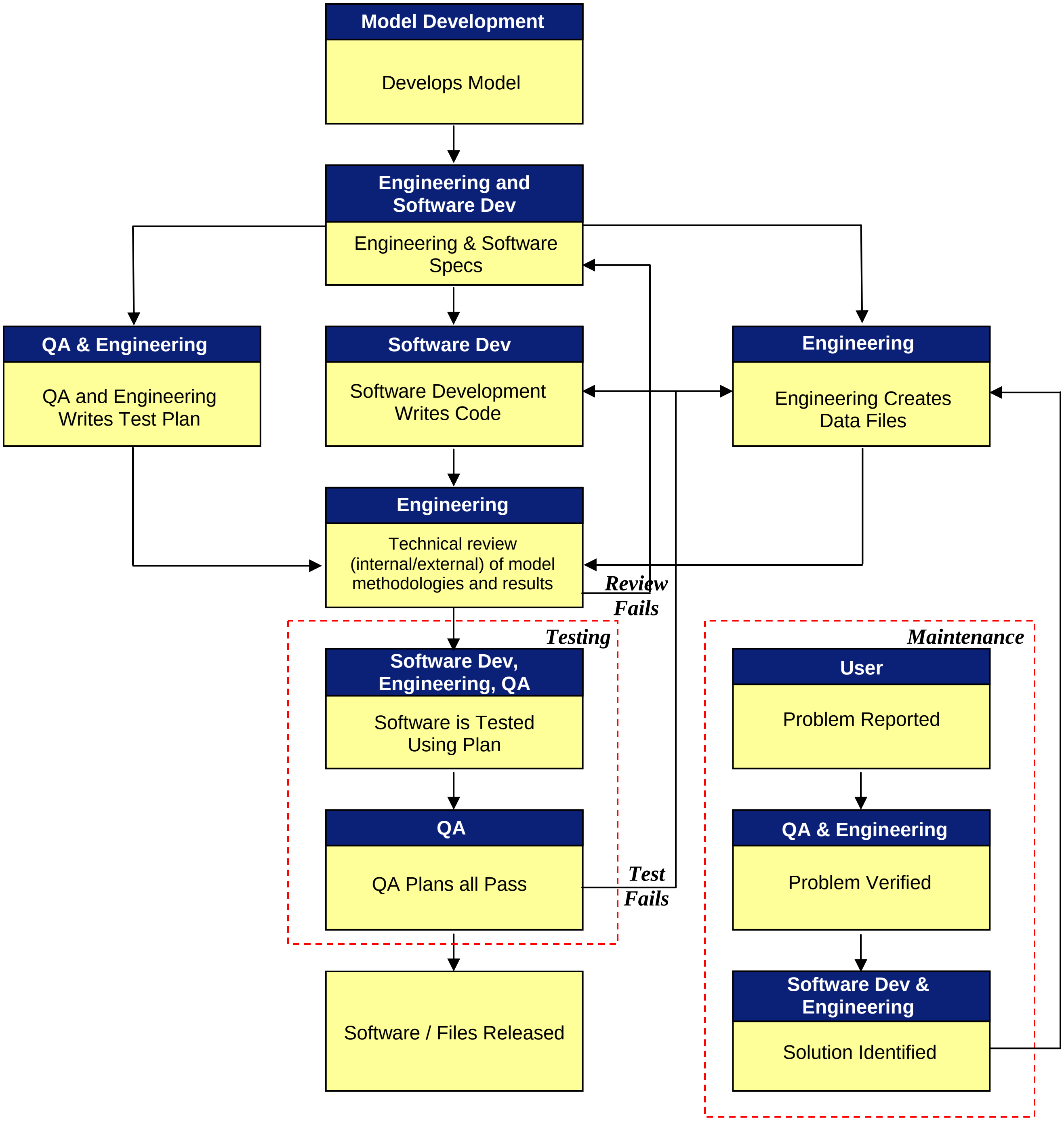


Figure 5: RMS Model Development, Testing, and Maintenance Business Workflow Diagram

In Figure 5, Model Development includes all individuals listed in Tables 2, 3, 4, 5 (except Jonathan Moss), and David Carttar (listed in Table 6). Software Development includes the individuals listed in Table 6 with the exception of Jim Tomcik and

Rajesh Singh. The leadership of our QA group includes Rajesh Singh and Jonathan Moss. Users are RMS clients (internal and external).

G-2.2.d Indicate specifically whether individuals listed in A. and B. are associated with the insurance industry, consumer advocacy group, or a government entity as well as their involvement with consulting activities.

Table 7: Individuals who are not Full-Time Employees

Name	Position/Credentials	Model Version	Development Role	Association
Dr. Rex Britter	Cambridge University	Latest	Random walk methodology	Private university; consults part time
Dr. Nicholas Cook	Director, Anemos Associated Ltd.	Latest	Surface roughness and wind field	Private consulting firm; consults full time
Dr. Alan Davenport	Director, BLWTL, University of Western Ontario, Canada	Previous	Meteorology	Public university; consults part time
Dr. Michael Drayton	Director, Three Letters Ltd.	Latest	Meteorology	Private consulting firm; consults full time
Dr. Craig Miller	Assistant Professor, University of Western Ontario, Canada	Latest	Surface roughness and wind field	Public university; consults part time
Mr. Charles Neumann	Former Director of Research, U.S. National Hurricane Center	Previous	Historical data	Government entity; consults part time
Dr. Dale Perry*	Professor, Texas A & M University	Previous	Vulnerability	Public university; consults part time
Dr. Timothy Reinhold	Institute of Business and Home Safety	Previous	Vulnerability and wind field	Non-profit Org; consults part time
Dr. Robert Sheets	Former Director of the National Hurricane Center	Previous	Meteorology	Government entity; consults part time
Dr. Peter Sparks	Professor, Clemson University	Previous	Vulnerability	Public university; consults part time
Dr. Norris Stubbs	Professor, Texas A & M University	Latest	Vulnerability	Public university; consults part time
Dr. Dave Surry	BLWTL, University of Western Ontario, Canada (previous version of model)	Previous	Meteorology	Public university; consults part time

*Dr. Perry died in 2001. He consulted to RMS from 1992-1999.

G-2.3 Independent Peer Review

G-2.3.a Provide dates of external independent peer reviews that have been performed on the following components as currently functioning in the model:

1. ***Meteorology***
2. ***Vulnerability***
3. ***Actuarial Science***
4. ***Statistics***
5. ***Computer Science***

The methodology used in the current Hurricane model has evolved over time. In addition to the extensive testing that RMS has itself performed on

S-5 Replication of Known Hurricane Losses

The model shall estimate incurred losses in an unbiased manner on a sufficient body of past hurricane events from more than one company, including the most current data available to the modeler. This Standard applies separately to personal residential and, to the extent data are available, to mobile homes. Personal residential experience may be used to replicate structure-only and contents-only losses. The replications shall be produced on an objective body of loss data by county or an appropriate level of geographic detail.

The RMS model is able to reliably and without significant bias reproduce incurred losses on a large body of past hurricanes, both for personal residential and mobile homes. Validations of known storm losses have been performed in several ways, including:

For recent events, on an industry basis. The RMS model is able to reasonably reproduce aggregate incurred industry losses in recent events.

For recent events, on a company-specific basis. The RMS model is able to reasonably reproduce aggregate incurred losses for a diverse set of insurers.

For recent events, on a geographic and demographic basis. The RMS model is able to reasonably reproduce the geographic spread of company specific losses, and the spread of losses between various lines of business and between various types of coverages.

For less recent events, on an industry basis. The RMS model is able to reasonably reproduce industry losses for less recent hurricanes, both in aggregate and on a broad geographic basis, for which some level of industry loss data is available[38].

Figure 45 and Figure 46 show the results of representative samples of the comparative analyses that have been performed.

[38] From 1950 onwards, Property Claims Services (PCS) has tracked the aggregate industry losses from hurricanes. While these estimates, particularly the older ones, are potentially unreliable and must be adjusted to reflect current demographic and economic conditions, these older events do provide a means for checking potential bias in the model.

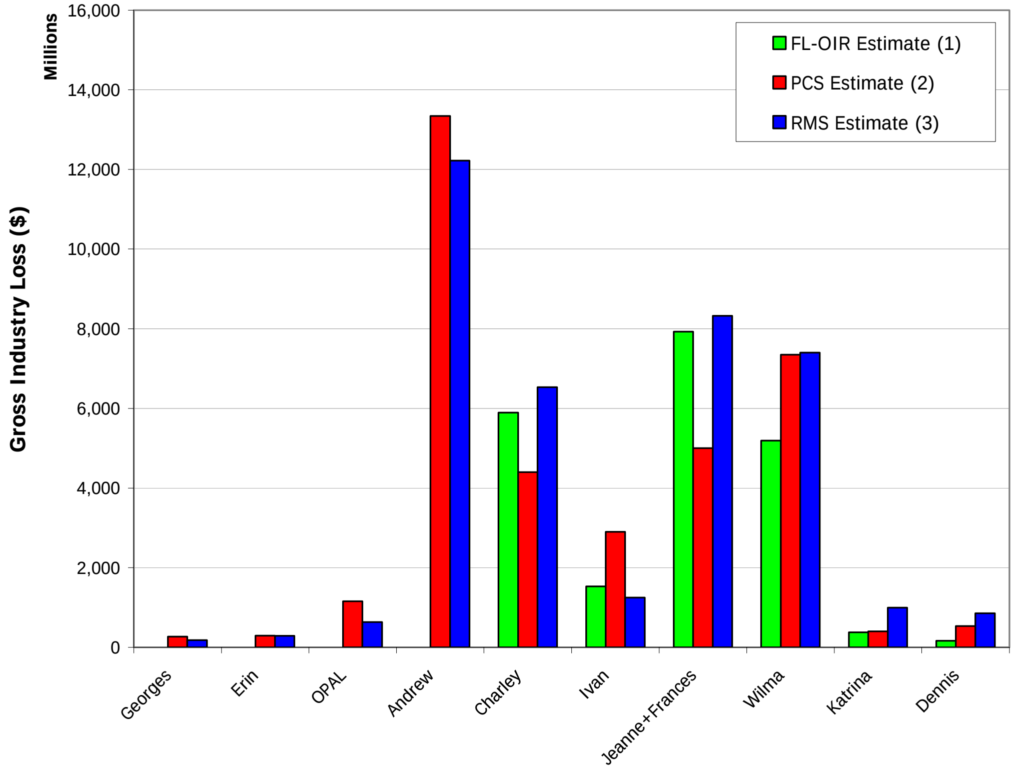


Figure 45: Industry Loss Estimates (Residential) for Recent Storms

(1) Estimates from Florida Office of Insurance Regulation report, "Hurricane Summary Data: CY 2004 and CY 2005" from August 2006. Loss represents residential lines and includes demand surge and underreporting estimates and excludes loss adjustment expense.

(2) Property Claims Services estimate of residential losses with adjustment to 2003 dollars for Andrew, Erin, and Georges. All others are estimates at time of event. Loss represents residential lines and does include demand surge and excludes loss adjustment expense.

(3) RMS estimates for residential lines and are based on for Georges, Erin, and Andrew are based on Industry Exposure for 2003. All others are based on Industry Exposure for 2005 and 2006 for CY2004 and CY 2005 events respectively. Losses include demand surge and exclude loss adjustment expenses.

Industry feedback indicates that Hurricanes Frances and Jeanne have been treated as one event from a claims and adjusting standpoint due to the inability of claims and adjusters to differentiate loss between the two events.

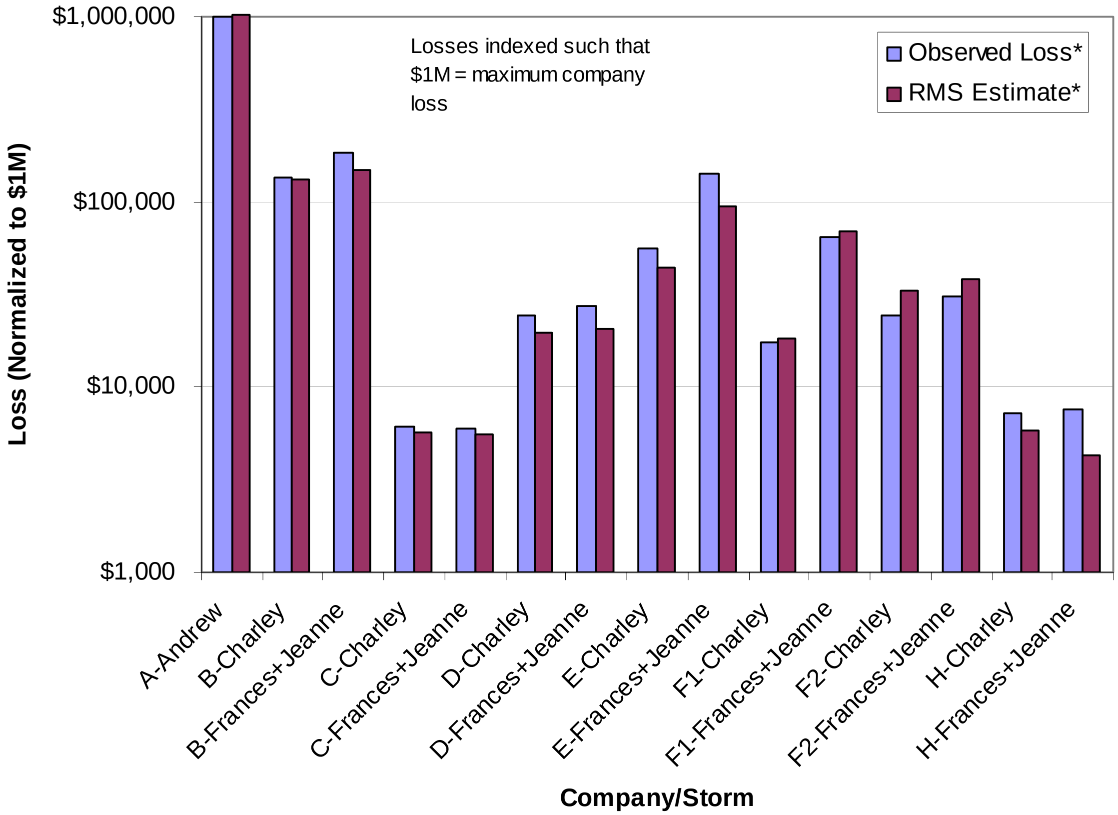


Figure 46: Company Specific Loss Comparisons for Residential (RES) Structure Types

**Loss includes demand surge but does not include loss adjustment expense.*

S-5.1 Describe the nature and results of the analyses performed to validate the loss projections generated by the model.

Insurance companies have supplied RMS with datasets containing the locations and building types associated with coverage and loss amounts. These datasets have been run against historical storms and the computed losses have been compared to the actual losses.

S-2 Sensitivity Analysis for Model Output

The modeler shall have assessed the sensitivity of temporal and spatial outputs with respect to the simultaneous variation of input variables using currently accepted scientific and statistical methods in the appropriate diciplines and have taken appropriate action.

We have assessed the sensitivity of temporal and spatial outputs with respect to the simultaneous variation of input variables using currently accepted scientific and statistical methods and have taken appropriate action.

S-2.1 *Provide a detailed explanation of the sensitivity analyses that have been performed on the model above and beyond those completed for the original submission of Form S-5 and provide specific results.*

We calculated the change in loss costs due to a 1% change in the following variables:

- Central pressure difference
- Rmax
- Forward speed

Figure 42 shows the change in loss costs due to a 1% change in the central pressure difference.

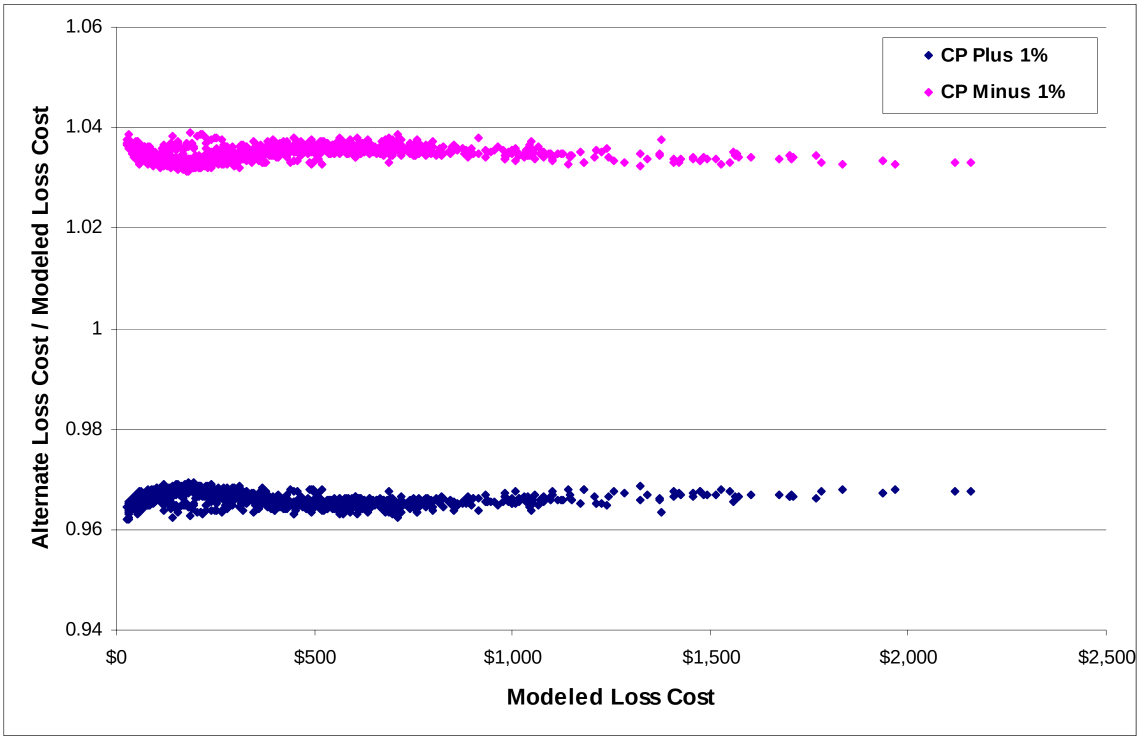


Figure 42: Sensitivity in Loss Costs Due to Central Pressure

Figure 43 shows the change in loss costs due to a 1% change in Rmax.

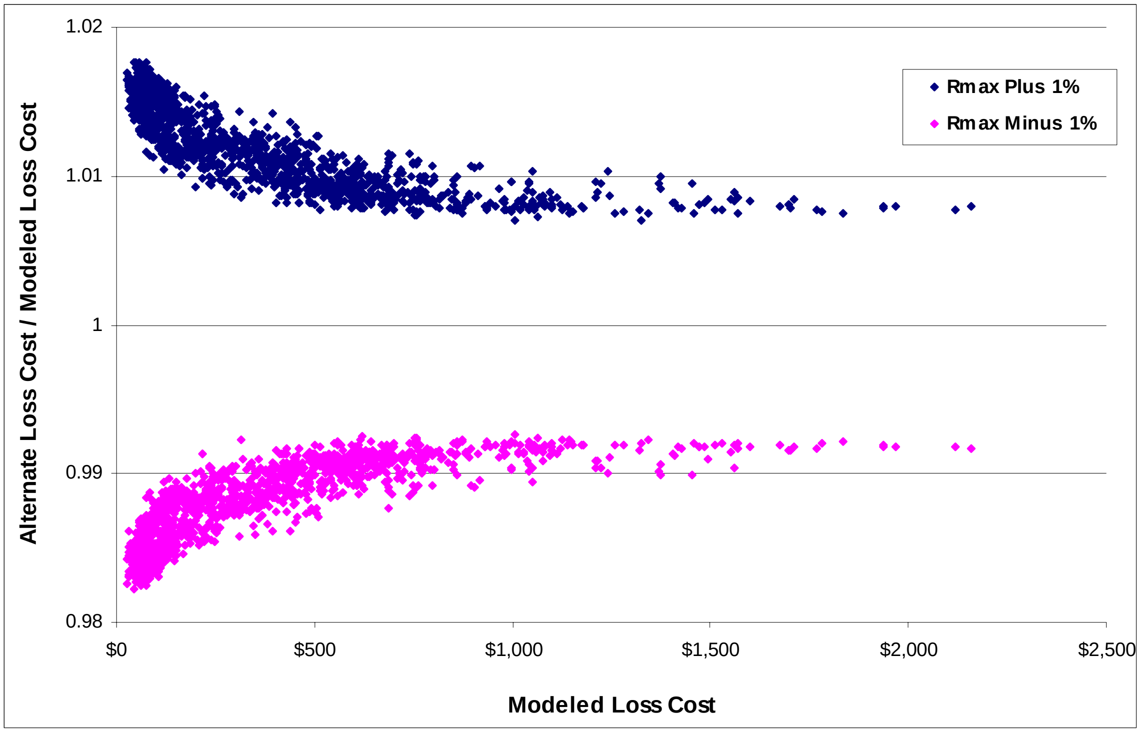


Figure 43: Sensitivity in Loss Costs Due to Rmax

The following figure shows the change in loss costs due to a 1% change in forward velocity.

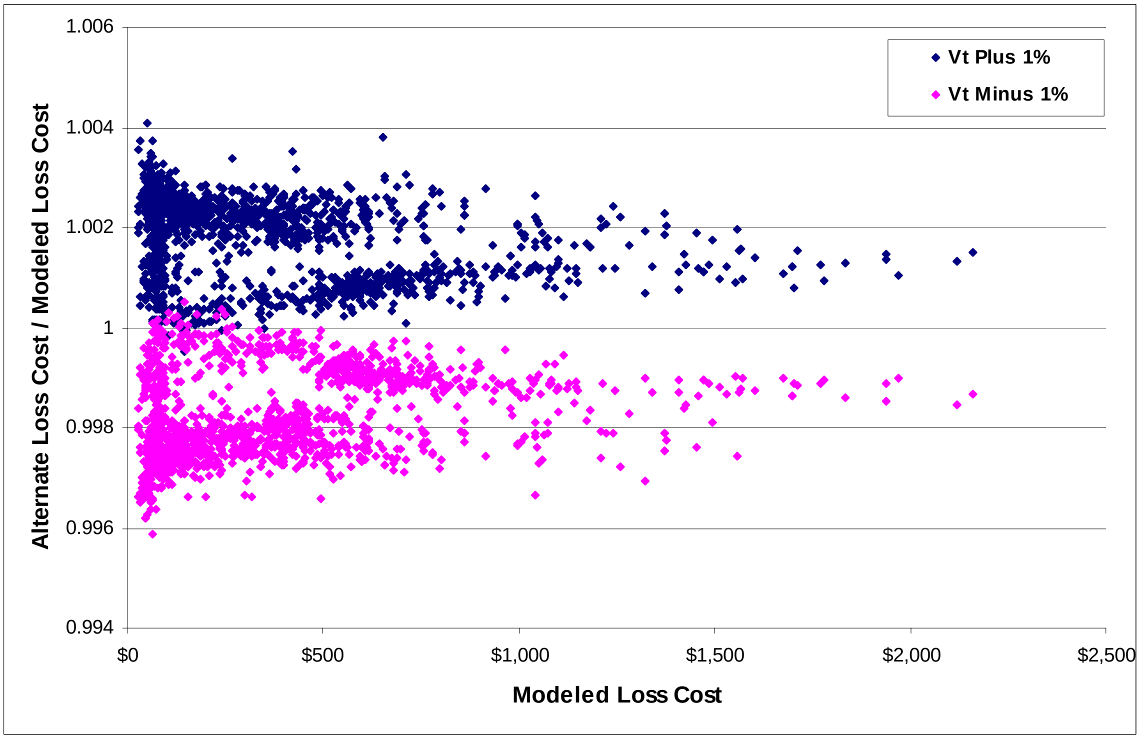


Figure 44: Sensitivity in Loss Costs Due to Forward Velocity

S-2.2 Provide a description of the statistical methods used to perform the sensitivity analysis.

In addition to the analyses described in section S-2.1, we have followed the procedures as described in the paper "Assessing Hurricane Effects. Part 1. Sensitivity Analysis," by Ronald L. Iman, Mark E. Johnson, and Tom E. Schroeder (Iman et al., 2002a), using the following variables:

- Central pressure
- Rmax
- Forward speed
- Exponent in the filling rate formula

The results of this analysis remain unchanged with respect to last year's submission.

S-2.3 Identify the most sensitive aspect of the model and the basis for making this determination. Provide a full discussion of the degree to which these sensitivities affect output results and illustrate with an example.

The most sensitive aspect of the model is central pressure. This determination was based on the sensitivity tests described above.

S-2.4 Describe how other aspects of the model may have a significant impact on the sensitivities in output results and the basis for making this determination.

The variables Rmax, forward speed, and the exponent in the filling rate formula have significant impacts on the sensitivities in output results. This was determined based on the analyses described in sections S-2.1 and S-2.2.

S-2.5 Describe actions taken in light of the sensitivity analyses performed.

No action was taken after reviewing the results of the sensitivity analysis.

S-2.6 Provide a completed Form S-5, Hypothetical Events for Sensitivity and Uncertainty Analysis (requirement for models submitted by modeling organizations which have not previously provided the Commission with this analysis).

Form S-5 is not provided in this Report of Compliance with Standards, since this has been previously submitted to the Commission.

II. COVERAGE

1. Perils – Coverage may be afforded only for direct loss by Hurricane, other Windstorm, or Hail to property as defined in the Citizens wind only policy forms. Hurricane, other Windstorm or Hail coverage may not be purchased individually or separately.

2. Coverage Limits

A. **Commercial-Residential** (Commercial-Residential Policy)

Standard Maximum limit for commercial-residential is $10,000,000. Citizens may write a commercial-residential risk with limits above $10,000,000 if coverage is not available in an authorized market.

This limit applies as follows:

1. Building only; or
2. Contents only; or
3. Building and contents.

Individual risk submission is required for any scheduled building with a replacement cost that exceeds $10,000,000.

B. **Commercial Property** (Commercial Policy)

Maximum limit for other commercial properties will not exceed $1,000,000 per insured per location.

This limit applies as follows:

1. Building only; or
2. Contents only; or
3. Building and contents.

C. **Mobile Homes** (Commercial Policy)

Maximum limit will not exceed $1,000,000.

This limit applies as follows:

1. Building only; or
2. Contents only; or
3. Building and contents.

D. **General Rules**

1. Wind policy limits may be increased at renewal or mid-term. Payment is required in accordance with applicable procedures, rules and rate schedules.
2. Citizens Wind Limits will be written as the primary layer and must be continuous. For example, we will not provide the first and third layers of limits.
3. Limits below $1,000,000 for a building and its contents are not available unless the value is also below $1,000,000. For example, if the value of a dwelling is $6,000,000, we will not insure it at $50,000 or $25,000. It must be insured for at least a minimum of $1,000,000. This applies to all occupancies.
4. First Loss Procedures apply to rating and policy conditions on risks when we do not insure to full value. See First Loss Procedures.
5. Limits in excess of the Standard Maximum Limits are not available for mobile home or non-residential commercial business.

3. Coverage Forms

A. Coverage is afforded only through the forms and endorsements found on the Citizens' website.

B. Additional Living Expense, Ordinance or Law, Tenant Building Alterations and Additions and Loss Assessment may be found in the Dwelling Wind Only Policy. Refer to the Dwelling Wind Only Policy for applicable description and limits.

C. Reporting Form, Blanket Insurance, Time Element, Consequential Loss and similar coverages are not available under any Commercial Wind Only Policy, Commercial-Residential Wind Only Policy, or Dwelling Wind Only Policy, unless stipulated in the policy form.

- Pay 40% of the policy premium plus 4% interest of the 2nd installment by the 180th day of the policy term.

Interest is charged at a rate of 4% per scheduled installment, subsequent to the first installment, which will not exceed approximately 8.5% simple interest per year on the unpaid balance. If the policy is cancelled, 100% of the interest will be refunded.

Lienholders, Mortgagees (e.g. Escrow) and Premium Finance Companies are not eligible for the Quarterly or Semi Annual payment plans.

5. Renewals

A. In order to continue wind-only coverage without interruption, the required premium must be received by Citizens before the expiration date. Premium payments received after the expiration date will become effective the day of receipt of the full premium, **subject to the Tropical Storm and Hurricane Restriction Rule**, and any applicable coverage, rate or rule changes.

B. Payment received later than ninety (90) days after expiration will not be accepted. Coverage must be rewritten and a new application must be submitted including required documents.

6. Annual Increase Limits Program

The Direct Bill Notice may reflect increases effective the inception of the renewed policy term for increased "cost of construction" on building, contents and other structure coverage amounts over $10,000. This increase construction factor is not applicable to mobile homes and its contents, risks using the "First Loss" rule, or policy amounts which have reached a maximum limit.

7. Policy Changes

A. Agents should submit policy change requests in writing to Citizens. Change requests become effective upon approval of Citizens.

B. Wind only policy change requests for increased coverage or additional coverage are effective at 12:01 A.M., Eastern Standard Time, (EST) the earlier of the day of receipt of the request or facsimile receipt of the request by Citizens at the Jacksonville office or at such later date as specified within the request and upon approval of Citizens.

1. Citizens will invoice, if an additional premium is required.
2. Payment of the full additional premium must be received by Citizens on or before the due date stipulated on the "*Endorsement Premium Due*" notice.
3. If the policy cancels, coverage must be rewritten with submission of a new complete application for coverage including required documents.

C. All changes shall be made using the rules and rates in effect at the inception of the policy or latest subsequent renewal date.

D. Policies may not be canceled and rewritten to circumvent forthcoming rate, rule, coverage or surcharge changes.

8. Cancellations and Nonrenewals

A. Cancellations shall be on a pro rata basis, subject to the rules below. Citizens disregards February 29th in leap years when determining return premiums.

B. By Policyholder – Wind Only Policies:

Cancellation requests must be in writing and provided on one of the following documents, which must be signed by all Named Insureds:

- Insured's Copy of Declarations Page
- *CIT F116 - Policy Release/Cancellation Request* (found in the Appendix)
- ACORD - Cancellation Request/Policy Release
- Letter from the first Named Insured
- Copy of Closing Notice signed by the Named Insured

C. Return Premiums – Wind Only Policies:

1. Return premium is pro rata under the following conditions:

   a. Citizens cancels the policy or reduces the coverage.

   b. The insured property is moved out of the eligible area.

   c. Coverage is rewritten with Citizens.

   NOTE: $100.00 retained premiums are for the wind only Commercial and Commercial-Residential policies. The Tax-Exempt Surcharge is not subject to the retained premium rule.

2. If a policy is cancelled by the insured, the policy is cancelled for non-payment of premium to a Premium Finance Company, or if the insured reduces the amount of insurance, return premium is pro rata if no coverage existed from June 1 to November 1. If coverage existed at any time from June 1 to November 1, the return premium is computed as follows:

1 YEAR POLICY	
DAYS POLICY IN FORCE	UNEARNED FACTOR
1 to 180	0.200
181 to 210	0.150
211 to 240	0.100
241 to 270	0.075
271 to 300	0.050
301 to 330	0.025
331 to 365	0.000

In addition, any current Citizens policyholder who replaces their Citizens policy with a policy that provides coverage including wind for anything less than a full annual term will be subject to the 80% minimum earned premium rule.

VI. Commissions

Commercial and Commercial-Residential Wind Only (Commercial and Commercial-Residential Policies):

1. Agent's commission for new and renewal business is derived from:

   a. actual premium; and

   b. if a minimum premium, the minimum premium

2. There is no commission on premium surcharges (i.e., catastrophe reinsurance surcharge, etc.) or the Florida Hurricane Catastrophe Fund Build-Up premium.

Modified Fire Resistive (code 5)

Buildings where the exterior walls and the floors and roof are constructed of masonry or fire resistive materials with a fire resistance rating of one hour or more but less than two hours.

Fire Resistive (code 6)

Building where the exterior walls and the floors and roof are constructed of masonry or fire resistive materials having a fire resistance rating of not less than two hours.

Superior Masonry/Heavy Timber (code 7)

Joisted masonry buildings where the entire roof is a minimum of 2 inches in thickness and is supported by timbers having a minimum dimension of 6 inches; or, where the entire roof assembly is documented to have a wind uplift classification of 90 or equivalent.

Superior Noncombustible (code 8)

Noncombustible buildings where the entire roof is constructed of 22 gauge metal (or heavier) on steel supports; or, where the entire roof is constructed of 2 inches of masonry on steel supports; or, where the entire roof assembly is documented to have a wind uplift classification of 90 or equivalent.

Superior Masonry Noncombustible (code 9)

Masonry noncombustible buildings where the entire roof is constructed of 2 inches of masonry on steel supports; or, when the entire roof is constructed of 22 gauge metal (or heavier) on steel supports; or, where the entire roof assembly is documented to have a wind uplift classification of 90 or equivalent.

3. Commercial Residential Windstorm Mitigation Definitions

A. Terrain Exposure Category Definitions

Apply Exposure Category (terrain) definitions from the Florida Building Code as follows:

Exposure C (open terrain with scattered obstructions) applies to:

1. All locations in HVHZ (Miami-Dade and Broward Counties); including.
2. Barrier islands as defined per s. 161.55(4), Florida Statutes, as the land area from the seasonal high water line to a line 5,000 feet landward from the Coastal Construction Control line.
3. All other areas with 1,500 feet of the coastal construction control line, or within 1,500 feet of the mean high tide line, whichever is less.
4. All other Citizens High Risk Account (Wind Only) eligible insuring areas.

B. Building Types

- **Type I** - Buildings that are 3 stories or less.
- **Type II** - Buildings that are 4 to 6 stories.
- **Type III** - Buildings that are 7 stories or more.

VIII. GENERAL RATING RULES – WIND ONLY POLICIES

1. General application of rates, rules, deductibles, policy forms and other associated rate credit/debit factors.

A. Rates, rules and other associated factors generally follow the specific occupancy classifications found in the rating and classification sections of this manual.

B. Deductible and policy form application follows the risk(s) occupancy classification.

1. However, when an auxiliary or commercial building or structure at the same location (premises) for the same insured is in conjunction with a commercial-residential occupancy (regardless of whether Citizens insures it or not), the policy form and deductible schedule follows the commercial-residential occupancy.

2. For example, a condominium office building used to service a residential condominium will use the commercial-residential deductible schedule and policy form, regardless of whether the primary condominium building is insured with Citizens or not.

3. Contact your Citizens wind only underwriter when additional classification is needed.

2. Term and Rating Territory Numbers –Wind Only Policies

A. All rates and premiums are for an annual term.

B. Territory numbers used to rate are listed in the wind only Commercial-Residential and Commercial Rating Territories in this section and correspond to designated “eligible areas”.

3. Rate and Premium Rounding – Waiver of Premium

A. Round rates after each calculation to three decimal places. Five tenths or more of a mill shall be considered one mill.

B. Round each premium calculation in the policy to the nearest whole dollar, with $.50 or more rounded to the next highest dollar.

C. All rates are per $1,000 of coverage.

4. Policy Minimum Premiums – Wind Only policies

A. Wind only Commercial Policy and Commercial-Residential Policy: **$200; $100** of premium is retained and fully earned (any exceptions are listed in Cancellation section).

B. Minimum premiums apply to policy premium, not individually to separately scheduled policy items. In commercial residential the minimum premium applies to the aggregate Adjusted Subtotal for the policy.

C. Reference the "Surcharges" section of this manual, as they may or may not apply to Minimum Premiums

7. Individual Risk Submission

A. Individual Risk Submission - (Commercial-Residential Policies)

Citizens will determine eligibility for coverage and a risk-specific rate. Citizens will require individual risk submission of the following:

1. Any risk with a replacement cost that exceeds $10,000,000 for any scheduled building.

2. Any risk in which the construction, condition, or location of the property is such that Citizens may choose to determine a rate and premium adequate for this exposure.

B. Individual risk submissions shall be submitted at least 30 business days prior to the requested effective date of coverage for individual risk rating, and shall be administered as an "individually rated" exposure in accordance with Florida Statute 627.062(3).

8. Other Coverages

A. Replacement Cost Coverage - (Commercial and Commercial-Residential Policies)

1. The policy provides loss settlement for building losses on a repair or replacement cost basis subject to certain conditions. Replacement cost coverage is not applicable to mobile homes which are settled on an Actual Cash Value (ACV) basis.

2. **ELIGIBILITY** - Replacement Cost Coverage is provided in the policy form for buildings and other structures. This includes building items of real property, including additions and alterations of a unit which is the commercial tenant's insurance responsibility, commercial unit owner building items described as "CONTENTS, ALTERATIONS, APPLIANCES, FIXTURES AND IMPROVEMENTS" which pertain exclusively to the condominium unit, commercial-residential buildings, builders' risks, commercial buildings and special class occupancies that are buildings or other structures. **Replacement Cost coverage is NOT applicable to contents or mobile homes.**

3. Coverage limits selected must represent 100% of the replacement value unless limited by the standard maximum policy limits available. Property not eligible for replacement cost coverage will be written on an ACV basis and may be insured from 80% to 100% of ACV.

4. When the ACV Option has been selected and the insured elects to endorse the insured property to replacement cost coverage, replacement coverage may be requested at renewal, midterm, or on new applications for coverage subject to approval by Citizens. This may result in additional premium due.

5. Guaranteed Replacement Cost Coverage is not available.

2. Rate Tables

Rate Table: **CC-D** Commercial Policy — Motel, Hotel buildings-Contents of Motel and Hotel buildings one story high (or not over 4 guest bedrooms per building) (Not Commercial-Residential)

Deductible: 3% of Value (Minimum $1,000)

NOTE: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory		BUILDING Base Rate Per $1,000				CONTENTS Base Rate Per $1,000			
		Combined Hurricane and Other Wind				Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	3.445	3.158	1.960	1.386	3.158	3.158	1.960	1.270
60	Brevard	3.445	3.445	2.138	1.386	3.158	3.158	1.960	1.270
35	Broward	5.359	5.359	3.154	2.138	5.359	4.912	2.891	1.960
36	Broward	5.359	5.359	3.154	2.138	5.359	5.359	3.154	2.138
37	Broward	5.359	5.359	3.154	2.138	5.359	4.912	2.891	1.960
61	Charlotte	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
62	Collier	3.445	3.445	2.138	1.386	3.445	3.312	1.966	1.386
30	Dade	5.359	5.359	3.154	2.138	5.359	5.359	3.154	2.138
31	Dade	5.359	5.359	3.154	2.138	5.359	5.359	3.154	2.138
32	Dade	5.359	5.359	3.154	2.138	5.359	4.941	2.891	1.960
34	Dade	5.359	5.359	3.154	2.138	5.359	4.912	2.891	1.960
41	Duval	2.955	2.955	1.834	1.189	2.955	2.955	1.834	1.189
43	Escambia	2.376	2.376	1.386	1.016	2.178	2.178	1.270	0.931
63	Escambia	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
64	Flagler	2.955	2.955	1.834	1.189	2.955	2.955	1.834	1.189
78	Flagler	2.178	2.178	1.270	0.931	2.178	2.178	1.270	0.931
65	Franklin	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
66	Gulf	3.445	3.158	2.055	1.386	3.158	3.158	1.960	1.270
56	Hernando	3.158	3.158	1.960	1.270	3.158	3.158	1.960	1.270
76	Indian River	5.359	4.912	3.154	2.138	4.912	4.912	2.891	1.960
67	Lee	3.445	3.445	2.138	1.386	3.445	3.158	1.960	1.386
79	Lee	2.343	2.178	1.357	1.016	2.178	2.178	1.270	0.931
57	Levy	3.158	3.158	1.970	1.386	3.158	3.158	1.960	1.270
68	Manatee	3.445	3.445	2.138	1.386	3.445	3.245	2.138	1.386
85	Monroe	7.497	7.497	4.395	2.904	7.497	6.872	4.395	2.904
86	Monroe	6.428	6.428	3.775	2.508	6.428	6.428	3.775	2.508
69	Nassau	2.955	2.955	1.834	1.189	2.955	2.955	1.834	1.189
70	Okaloosa	3.445	3.445	2.138	1.386	3.219	3.158	1.960	1.384
38	Palm Beach	5.359	5.330	3.154	2.138	4.912	4.912	2.891	1.960
87	Palm Beach	5.359	5.359	3.154	2.138	5.359	4.921	3.154	2.138
88	Pasco	3.158	3.158	1.960	1.270	3.158	3.158	1.960	1.270
42	Pinellas	3.445	3.445	2.138	1.386	3.445	3.421	2.138	1.386
71	Saint Johns	3.097	3.097	1.922	1.246	3.097	3.097	1.922	1.246
77	Saint Lucie	5.359	5.218	3.154	2.138	4.912	4.912	2.891	1.960
72	Santa Rosa	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
80	Santa Rosa	2.376	2.376	1.386	1.016	2.376	2.178	1.386	1.016
73	Sarasota	3.445	3.248	2.138	1.386	3.158	3.158	1.960	1.270
81	Sarasota	2.376	2.376	1.386	1.016	2.178	2.178	1.270	0.931
44	Volusia	2.100	2.100	1.225	0.898	2.100	2.100	1.225	0.898
74	Volusia	3.158	3.158	1.960	1.334	3.158	3.158	1.960	1.270
58	Wakulla	3.158	3.158	1.960	1.270	3.158	3.158	1.960	1.270
75	Walton	3.445	3.445	2.138	1.386	3.265	3.158	1.960	1.270

Rate Table: **CC-E** Commercial Policy

Motel, Hotel buildings-Contents of Motel and Hotel buildings (over one story high and over 4 guest bedrooms per building) (Not Commercial-Residential)

Deductible: 3% of Value (Minimum $1,000)

NOTE: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory			BUILDING Base Rate Per $1,000					CONTENTS Base Rate Per $1,000			
			Combined Hurricane and Other Wind					Combined Hurricane and Other Wind			
Number	Description		Frame	Masonry	SWR	WR		Frame	Masonry	SWR	WR
59	Bay		4.356	3.158	1.960	1.386		4.356	3.158	1.960	1.270
60	Brevard		4.699	3.445	2.138	1.386		4.356	3.158	1.960	1.270
35	Broward		7.972	6.903	5.892	5.420		7.308	6.328	5.892	5.420
36	Broward		7.972	6.903	6.428	5.913		7.972	6.458	5.892	5.420
37	Broward		7.972	6.584	5.892	5.420		7.308	6.328	5.892	5.420
61	Charlotte		4.752	3.445	2.138	1.386		4.653	3.159	2.138	1.386
62	Collier		4.752	3.445	2.138	1.386		4.752	3.322	1.973	1.386
30	Dade		7.972	6.903	6.428	5.548		7.972	6.328	5.892	5.420
31	Dade		7.972	6.903	6.405	5.513		7.972	6.328	5.892	5.420
32	Dade		7.972	6.903	5.892	5.420		7.757	6.328	5.892	5.420
34	Dade		7.972	6.606	5.892	5.420		7.308	6.328	5.892	5.420
41	Duval		4.076	2.955	1.834	1.189		4.076	2.955	1.834	1.189
43	Escambia		3.195	2.376	1.386	1.016		3.158	2.178	1.270	0.931
63	Escambia		4.752	3.445	2.138	1.386		4.491	3.158	2.138	1.386
64	Flagler		4.076	2.955	1.834	1.189		4.076	2.955	1.834	1.189
78	Flagler		3.158	2.178	1.270	0.931		3.158	2.178	1.270	0.931
65	Franklin		4.752	3.445	2.138	1.386		4.356	3.158	2.138	1.386
66	Gulf		4.356	3.158	2.059	1.386		4.356	3.158	1.960	1.270
56	Hernando		4.356	3.158	1.960	1.270		4.356	3.158	1.960	1.270
76	Indian River		7.308	6.328	5.892	5.420		7.308	6.328	5.892	5.420
67	Lee		4.752	3.445	2.138	1.386		4.356	3.158	1.960	1.386
79	Lee		3.158	2.178	1.359	1.016		3.158	2.178	1.270	0.931
57	Levy		4.356	3.158	1.974	1.386		4.356	3.158	1.960	1.270
68	Manatee		4.752	3.445	2.138	1.386		4.748	3.254	2.138	1.386
85	Monroe		11.180	9.108	8.191	6.340		10.248	8.833	8.191	6.340
86	Monroe		7.972	6.428	5.280	4.395		7.972	6.428	4.840	4.029
69	Nassau		4.076	2.955	1.834	1.189		4.076	2.955	1.834	1.189
70	Okaloosa		4.752	3.445	2.138	1.386		4.356	3.158	1.960	1.386
38	Palm Beach		7.308	6.328	5.892	5.420		7.308	6.328	5.892	5.420
87	Palm Beach		7.972	6.903	6.388	5.420		7.332	6.328	5.892	5.420
88	Pasco		4.356	3.158	1.960	1.270		4.356	3.158	1.960	1.270
42	Pinellas		4.752	3.445	2.138	1.386		4.752	3.432	2.138	1.386
71	Saint Johns		4.272	3.097	1.922	1.246		4.272	3.097	1.922	1.246
77	Saint Lucie		7.308	6.328	5.892	5.420		7.308	6.328	5.892	5.420
72	Santa Rosa		4.752	3.445	2.138	1.386		4.620	3.158	2.138	1.386
80	Santa Rosa		3.445	2.376	1.386	1.016		3.158	2.178	1.386	1.016
73	Sarasota		4.371	3.253	2.138	1.386		4.356	3.158	1.960	1.270
81	Sarasota		3.445	2.376	1.386	1.016		3.158	2.178	1.270	0.931
44	Volusia		3.045	2.100	1.225	0.898		3.045	2.100	1.225	0.898
74	Volusia		4.356	3.158	1.960	1.336		4.356	3.158	1.960	1.270
58	Wakulla		4.356	3.158	1.960	1.270		4.356	3.158	1.960	1.270
75	Walton		4.752	3.445	2.138	1.386		4.356	3.158	1.960	1.270

Rate Table: **CC-F** Commercial Policy

All other commercial buildings including commercial condominiums except Special Class, Builder's Risk, Commercial-Residential and other occupancies listed in this section and contents therein (i.e. office, mercantile, parking garage, bank, restaurant, church, grocery store, etc.).

Deductible: 3% of Value (Minimum $1,000)

NOTE: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory			BUILDING Base Rate Per $1,000					CONTENTS Base Rate Per $1,000			
			Combined Hurricane and Other Wind					Combined Hurricane and Other Wind			
Number	Description		Frame	Masonry	SWR	WR		Frame	Masonry	SWR	WR
59	Bay		4.670	3.448	2.081	1.343		4.670	3.448	2.081	1.343
60	Brevard		4.670	3.448	2.270	1.465		4.670	3.448	2.081	1.343
35	Broward		7.761	5.702	3.471	2.270		7.114	5.227	3.182	2.081
36	Broward		7.761	5.702	3.471	2.270		7.114	5.227	3.182	2.270
37	Broward		7.343	5.467	3.471	2.270		7.114	5.227	3.182	2.081
61	Charlotte		5.095	3.762	2.270	1.465		4.670	3.448	2.081	1.419
62	Collier		5.095	3.762	2.270	1.465		4.670	3.448	2.081	1.343
30	Dade		7.761	5.702	3.471	2.270		7.114	5.227	3.182	2.081
31	Dade		7.761	5.702	3.471	2.270		7.114	5.227	3.182	2.081
32	Dade		7.761	5.702	3.471	2.270		7.114	5.227	3.182	2.081
34	Dade		7.345	5.484	3.458	2.270		7.114	5.227	3.182	2.081
41	Duval		4.370	3.227	1.947	1.257		4.370	3.227	1.947	1.257
43	Escambia		3.448	2.335	1.465	1.069		3.448	2.335	1.343	0.980
63	Escambia		5.095	3.762	2.270	1.465		4.670	3.448	2.081	1.343
64	Flagler		4.370	3.227	1.947	1.257		4.370	3.227	1.947	1.257
78	Flagler		3.448	2.335	1.343	0.980		3.448	2.335	1.343	0.980
65	Franklin		4.785	3.625	2.270	1.465		4.670	3.448	2.081	1.400
66	Gulf		4.670	3.448	2.081	1.427		4.670	3.448	2.081	1.343
56	Hernando		4.670	3.448	2.081	1.343		4.670	3.448	2.081	1.343
76	Indian River		7.114	5.227	3.182	2.270		7.114	5.227	3.182	2.081
67	Lee		5.095	3.762	2.270	1.465		4.670	3.448	2.081	1.343
79	Lee		3.448	2.335	1.343	0.980		3.448	2.335	1.343	0.980
57	Levy		4.670	3.448	2.081	1.343		4.670	3.448	2.081	1.343
68	Manatee		5.095	3.762	2.270	1.465		4.670	3.448	2.081	1.465
85	Monroe		10.089	7.562	4.936	3.339		9.897	7.235	4.525	3.061
86	Monroe		8.487	6.784	4.276	2.798		7.780	6.219	3.920	2.565
69	Nassau		4.370	3.227	1.947	1.257		4.370	3.227	1.947	1.257
70	Okaloosa		4.670	3.448	2.270	1.465		4.670	3.448	2.081	1.343
38	Palm Beach		7.114	5.227	3.182	2.270		7.114	5.227	3.182	2.081
87	Palm Beach		7.761	5.702	3.471	2.270		7.114	5.227	3.182	2.081
88	Pasco		4.670	3.448	2.081	1.343		4.670	3.448	2.081	1.343
42	Pinellas		5.095	3.762	2.270	1.465		4.670	3.448	2.081	1.465
71	Saint Johns		4.580	3.382	2.041	1.317		4.580	3.382	2.041	1.317
77	Saint Lucie		7.114	5.227	3.471	2.270		7.114	5.227	3.182	2.081
72	Santa Rosa		5.095	3.762	2.270	1.465		4.670	3.448	2.081	1.395
80	Santa Rosa		3.762	2.547	1.465	1.069		3.448	2.335	1.343	0.980
73	Sarasota		4.670	3.448	2.081	1.465		4.670	3.448	2.081	1.343
81	Sarasota		3.448	2.516	1.465	1.069		3.448	2.335	1.343	0.980
44	Volusia		3.325	2.252	1.295	0.945		3.325	2.252	1.295	0.945
74	Volusia		4.670	3.448	2.081	1.343		4.670	3.448	2.081	1.343
58	Wakulla		4.670	3.448	2.081	1.343		4.670	3.448	2.081	1.343
75	Walton		4.670	3.448	2.081	1.465		4.670	3.448	2.081	1.343

Rate Table: **CC-G** Commercial Policy

Nursing Home, Dormitory, Sorority and Fraternity House buildings, Boarding House buildings which are nonowner are nonowner occupied and less than 5 roomers - contents therein.

Deductible: 3% of Value (Minimum $1,000)

NOTE: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory			BUILDING Base Rate Per $1,000 Combined Hurricane and Other Wind					CONTENTS Base Rate Per $1,000 Combined Hurricane and Other Wind			
Number	Description		Frame	Masonry	SWR	WR		Frame	Masonry	SWR	WR
59	Bay		2.085	2.085	1.911	1.694		1.386	1.270	1.270	1.149
60	Brevard		2.085	2.085	2.085	1.848		1.386	1.386	1.270	1.149
35	Broward		3.141	3.141	3.154	2.719		2.085	2.085	1.911	1.669
36	Broward		3.141	3.141	3.154	2.719		2.085	2.085	2.085	1.821
37	Broward		3.141	3.141	3.154	2.719		2.085	2.085	1.911	1.669
61	Charlotte		2.085	2.085	2.085	1.848		1.386	1.386	1.386	1.254
62	Collier		2.085	2.085	2.085	1.848		1.386	1.386	1.386	1.254
30	Dade		3.141	3.141	3.154	2.719		2.085	2.085	2.085	1.821
31	Dade		3.141	3.141	3.154	2.719		2.085	2.085	2.085	1.821
32	Dade		3.141	3.141	3.154	2.719		2.085	2.085	1.917	1.669
34	Dade		3.141	3.141	3.154	2.719		2.085	2.085	1.911	1.669
41	Duval		1.789	1.789	1.789	1.585		1.189	1.189	1.189	1.076
43	Escambia		1.386	1.386	1.386	1.254		0.937	0.937	0.834	0.762
63	Escambia		2.085	2.085	2.085	1.848		1.386	1.386	1.386	1.254
64	Flagler		1.952	1.789	1.789	1.585		1.189	1.189	1.189	1.076
78	Flagler		1.386	1.384	1.270	1.149		0.937	0.859	0.834	0.762
65	Franklin		2.085	2.085	2.085	1.848		1.386	1.386	1.386	1.254
66	Gulf		2.085	2.085	1.911	1.694		1.386	1.386	1.270	1.149
56	Hernando		2.085	1.911	1.911	1.694		1.270	1.270	1.270	1.149
76	Indian River		3.141	3.141	3.121	2.548		2.085	2.085	1.911	1.669
67	Lee		2.085	2.085	2.085	1.848		1.386	1.386	1.386	1.254
79	Lee		1.386	1.386	1.270	1.149		0.937	0.859	0.834	0.762
57	Levy		2.085	2.025	1.911	1.694		1.386	1.270	1.270	1.149
68	Manatee		2.085	2.085	2.085	1.848		1.386	1.386	1.386	1.254
85	Monroe		4.395	4.395	4.395	3.814		2.943	2.943	2.943	2.521
86	Monroe		3.933	3.933	3.933	3.392		2.626	2.626	2.626	2.257
69	Nassau		1.789	1.789	1.789	1.585		1.189	1.189	1.189	1.076
70	Okaloosa		2.085	2.085	2.085	1.848		1.386	1.386	1.386	1.238
38	Palm Beach		3.141	3.141	3.154	2.719		2.085	2.085	1.911	1.669
87	Palm Beach		3.141	3.141	3.154	2.719		2.085	2.085	2.085	1.821
88	Pasco		2.085	1.911	1.911	1.694		1.270	1.270	1.270	1.149
42	Pinellas		2.085	2.085	2.085	1.848		1.386	1.386	1.386	1.254
71	Saint Johns		1.875	1.875	1.875	1.661		1.246	1.246	1.246	1.127
77	Saint Lucie		3.141	3.141	3.154	2.719		2.085	2.085	2.061	1.669
72	Santa Rosa		2.085	2.085	2.085	1.848		1.386	1.386	1.386	1.254
80	Santa Rosa		1.386	1.386	1.386	1.254		0.937	0.937	0.910	0.831
73	Sarasota		2.085	2.085	2.085	1.834		1.386	1.386	1.270	1.149
81	Sarasota		1.386	1.386	1.386	1.254		0.937	0.937	0.845	0.762
44	Volusia		1.337	1.225	1.225	1.108		0.842	0.828	0.805	0.735
74	Volusia		2.085	1.914	1.911	1.694		1.386	1.270	1.270	1.149
58	Wakulla		2.085	1.911	1.911	1.694		1.292	1.270	1.270	1.149
75	Walton		2.085	2.085	2.085	1.820		1.386	1.386	1.270	1.149

Rate Table: **CC-H** Commercial Policy

Commercial mobile home and commercial mobile home contents (Not Commercial-Residential)

Deductible: 3% of Value (Minimum $1,000)

Note: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory		BUILDING Base Rate Per $1,000		CONTENTS Base Rate Per $1,000
Number	Description	Combined Hurricane and Other Wind		Combined Hurricane and Other Wind
59	Bay	8.486		8.486
60	Brevard	9.193		8.486
35	Broward	13.126		12.031
36	Broward	13.126		13.126
37	Broward	13.126		12.031
61	Charlotte	9.258		8.486
62	Collier	9.258		8.486
30	Dade	12.053		12.053
31	Dade	12.053		12.053
32	Dade	13.126		12.031
34	Dade	13.126		12.031
41	Duval	7.941		7.941
43	Escambia	5.683		5.210
63	Escambia	9.258		8.486
64	Flagler	7.941		7.941
78	Flagler	5.210		5.210
65	Franklin	9.258		8.486
66	Gulf	8.486		8.486
56	Hernando	8.486		8.486
76	Indian River	12.053		11.049
67	Lee	9.258		8.486
79	Lee	5.683		5.210
57	Levy	8.486		8.486
68	Manatee	9.258		8.486
85	Monroe	16.468		15.096
86	Monroe	16.468		15.096
69	Nassau	7.941		7.941
70	Okaloosa	9.258		8.486
38	Palm Beach	13.126		12.031
87	Palm Beach	13.126		12.031
88	Pasco	8.486		8.486
42	Pinellas	8.881		8.141
71	Saint Johns	8.323		8.323
77	Saint Lucie	13.126		12.031
72	Santa Rosa	9.258		8.486
80	Santa Rosa	5.683		5.210
73	Sarasota	8.957		8.486
81	Sarasota	5.683		5.210
44	Volusia	5.025		5.025
74	Volusia	7.793		7.793
58	Wakulla	8.486		8.486
75	Walton	9.258		8.486

XI. PREMIUM DETERMINATION, RATE TABLES AND RATING TERRITORIES

1. Special Class Premium Determination – Wind Only Policies

A. **Special Class** - Real and tangible property which may be unique and unusual, and not specifically rated elsewhere in the manual. The following applies.

1. Only Properties listed may be rated with appropriate Special Class descriptions and upon approval of the Citizens Jacksonville office. <u>Other property types including some with similar characteristics may not be insured</u>.

2. Determine the structure and/or contents classification based on the appropriate Special Class Occupancy description and construction.

3. Determine the S-Number based on the construction (where applicable) and the description of the risk(s).

4. Each rate table contains separate schedules for Hurricane rates and for Other Windstorm or Hail (OWH) rates, which are calculated separately to each peril rate and then combined to a single Hurricane, Other Windstorm or Hail rate. (Exception: Rate Table SC-C contains a single **combined** Hurricane and OWH rate.)

5. Determine the appropriate policy form for the risk(s) and select the appropriate Special Class Rate Table.

   a. Table **<u>SC-C</u>** is for all other structures **and their contents** which will be issued under the wind only Commercial Policy. (The rate table deductible is 3% of insured value with $1000 minimum; 5% deductibles is available.)

   b. Table **<u>SC-D</u>** is for all other structures **and their contents** which are located on a commercial-residential premises and are issued under the wind only Commercial - Residential policy (i.e., apartments, buildings, condominium and townhouse association buildings, etc.). (The rate table deductible is 3% of insured value $1000 minimum; 5% and 10% deductibles are available.)

6. From the appropriate rate table, determine each separate rate (or combined/single rate where applicable) based on territory and S-Number. Multiply or add applicable "Rate Modifiers" to each separate Hurricane and each separate Other Wind or Hail (OWH) rate, or combined/single rate where applicable.

7. Rate Modifiers (Expressed as a component of each separate rate.) - Apply sequentially to each separate Hurricane rate and each separate Other Windstorm or Hail (OWH) rate, as applicable.

   NOTE: Factors may differ between Hurricane and Other Wind or Hail modifiers.

   a. **Selection of "other" Deductible(s) - as applicable, multiply** each separate Hurricane and separate OWH "other" Deductible factor times each separate rate in A.5) above, rounded to three (3) places. Where a **combined** Hurricane and OWH (single rate) rate table is found, **multiply** the single rate by the combined "other" Deductible factor as shown in the Deductible section of the manual. **Deductible factors for Commercial and Commercial-Residential Special Class items are found in the General Rating Section.**

b. **Coinsurance Factor** - Applicable to Commercial and Commercial-Residential Special Class items (Table **SC-C** and **SC-D** only.) For Commercial, if 90% coinsurance selected, **multiply** each **combined** Hurricane and OWH rate developed above times **.95**. For **100%** coinsurance selected, **multiply** each **combined** Hurricane and OWH rate (single rate) developed above times **.90**, rounded to three (3) places. For Commercial-Residential, if 90% coinsurance selected, multiply each separate Hurricane and separate OWH rate developed above, times .95. If 100% coinsurance selected, multiply each separate Hurricane and separate OWH rate developed above times .90. These coinsurance factors do not apply to Residential policies or properties.

NOTE: Buildings and other insured structures must still be insured to 100% of replacement cost regardless of coinsurance factor selected (unless subject to "First Loss" rules or ACV Loss Settlement Citizens CIT–W0475).

c. **BCEGS - "BCEGS is not available to Special Class Properties except occupancies listed as "Fully Enclosed Appurtenant Structures."** Where applicable, select the appropriate BCEGS factor by Community Grade. Multiply the BCEGS factor to each separate Hurricane and OWH rate developed above, rounded to three (3) places. Where a **combined** Hurricane and OWH rate table is found, **multiply** the BCEGS factor to the single Hurricane and OWH rate developed above, rounded to three (3) places.

8. **Add** the rounded Hurricane **subtotal** rate developed above and the rounded OWH **subtotal** rate developed above **together**. (This equals a combined Hurricane and OWH total rate. (This step is not applicable to a combined rate.)

9. **Multiply** the combined Hurricane and OWH rate (rate per $1,000) times the limit of liability to develop a premium for each risk(s) or item(s) insured.

10. Deductibles apply as appropriate to each wind only policy form. Deductibles apply separately to each structure or group of similar structures (i.e., telephone poles) and upon approval by Citizens. Optional deductibles are available.

11. Limit of liability must reflect 100% of value. Coinsurance and Loss Settlement clauses apply. Do not underinsure the value of the property.

12. If the amount of insurance selected, or if the value exceeds an amount which permits compliance with the coinsurance clause and/or underwriting rules, see "First Loss" Rule.

13. Total all premiums of all risks to be insured on the policy, each structure or building, each structure's contents, etc., to develop the "base" policy premium.

14. Apply the appropriate premium surcharge(s) to the "base" policy premium developed to determine the total policy premium.

2. Descriptions of Eligible Special Class Properties

A. Fully Enclosed Appurtenant Structures (BCEGS Factors are applicable to risks insured under this classification.)

5. Rate Tables

Rate Table: SC-C
All other structures - commercial policy occupancies.

Deductible: 3% of Value (Minimum $1,000)

Rate Per $1,000

Classification	Territory								
	30-38 77, 87	76	41, 56, 57, 64, 69, 74, 88	42, 59, 60, 62, 70-73, 75	58, 61, 63, 65-68	43, 79, 80, 81	44, 78	85, Monroe Remainder	86, City of Key West Only
COMBINED HURRICANE AND OTHER WINDSTORM OR HAIL									
S-1	0.600	0.600	0.300	0.300	0.300	0.300	0.300	0.840	0.680
S-2	0.900	0.900	0.600	0.600	0.600	0.300	0.300	1.260	1.010
S-3	1.100	1.100	0.800	0.800	0.800	0.600	0.600	1.540	1.240
S-5	1.700	1.700	1.100	1.100	1.100	0.800	0.800	2.380	1.910
S-5A	1.700	1.700	1.100	1.100	1.100	0.900	0.900	2.380	1.910
S-6B	2.610	2.610	1.700	1.700	1.700	1.100	1.100	3.650	2.940
S-9	4.190	4.190	2.760	2.760	2.760	2.000	2.000	5.870	4.710
S-10	5.160	5.160	3.410	3.410	3.410	2.580	2.580	7.220	5.810
S-10B	8.070	8.070	3.630	3.630	3.630	2.730	2.730	11.300	9.080
S-11	8.470	8.470	5.680	5.680	5.680	4.240	4.240	11.860	9.530
S-12	11.070	11.070	7.570	7.570	7.570	5.680	5.680	15.500	12.450
S-13	14.720	14.720	9.840	9.840	9.840	7.320	7.320	20.610	16.560
S-16A	29.460	29.460	19.600	19.600	19.600	14.720	14.720	41.240	33.140
S-17	37.620	37.620	25.140	25.140	25.140	20.920	20.920	52.670	42.320
S-17A	39.200	39.200	16.220	16.220	16.220	12.280	12.280	54.880	44.100
S-18A	44.180	44.180	29.460	29.460	29.460	22.040	22.040	61.850	49.700
S-22	117.820	117.820	78.600	78.600	78.600	58.900	58.900	164.950	132.550

1. If applicable, use the “all other” BCEGS grades.
2. BCEGS Factors apply only to the Special Class “Other Structures” occupancy listing.

Rate Table: SC-D
All other structures - Commercial-Residential policy occupancies.

Deductible: 3% of Value (Minimum $1000) Rate Per $1,000

Classification	Territory								
	30-38, 77, 87	76	41, 56, 57, 64, 69, 74, 88	42, 59, 60, 62, 70-73, 75	58, 61, 63, 65-68	43, 79 80, 81	44, 78	85, Monroe Remainder	86, City of KEY WEST ONLY
HURRICANE									
S-1	0.570	0.570	0.285	0.285	0.285	0.285	0.285	0.798	0.646
S-2	0.855	0.855	0.570	0.570	0.570	0.285	0.285	1.197	0.960
S-3	1.045	1.045	0.760	0.760	0.760	0.570	0.570	1.463	1.178
S-5	1.615	1.615	1.045	1.045	1.045	0.760	0.760	2.261	1.815
S-5A	1.615	1.615	1.045	1.045	1.045	0.855	0.855	2.261	1.815
S-6B	2.480	2.480	1.615	1.615	1.615	1.045	1.045	3.468	2.793
S-9	3.981	3.981	2.622	2.622	2.622	1.900	1.900	5.577	4.475
S-10	4.902	4.902	3.240	3.240	3.240	2.451	2.451	6.859	5.520
S-10B	7.667	7.667	3.449	3.449	3.449	2.594	2.594	10.735	8.626
S-11	8.047	8.047	5.396	5.396	5.396	4.028	4.028	11.267	9.054
S-12	10.517	10.517	7.192	7.192	7.192	5.396	5.396	14.725	11.828
S-13	13.984	13.984	9.348	9.348	9.348	6.954	6.954	19.580	15.732
S-16A	27.987	27.987	18.620	18.620	18.620	13.984	13.984	39.178	31.483
S-17	35.739	35.739	23.883	23.883	23.883	19.874	19.874	50.037	40.204
S-17A	37.240	37.240	15.409	15.409	15.409	11.666	11.666	52.136	41.895
S-18A	41.971	41.971	27.987	27.987	27.987	20.938	20.938	58.758	47.215
S-22	111.929	111.929	74.670	74.670	74.670	55.955	55.955	156.703	125.923
Other Wind									
S-1	0.030	0.030	0.015	0.015	0.015	0.015	0.015	0.042	0.034
S-2	0.045	0.045	0.030	0.030	0.030	0.015	0.015	0.063	0.051
S-3	0.055	0.055	0.040	0.040	0.040	0.030	0.030	0.077	0.062
S-5	0.085	0.085	0.055	0.055	0.055	0.040	0.040	0.119	0.096
S-5A	0.085	0.085	0.055	0.055	0.055	0.045	0.045	0.119	0.096
S-6B	0.131	0.131	0.085	0.085	0.085	0.055	0.055	0.183	0.147
S-9	0.210	0.210	0.138	0.138	0.138	0.100	0.100	0.294	0.236
S-10	0.258	0.258	0.171	0.171	0.171	0.129	0.129	0.361	0.291
S-10B	0.404	0.404	0.182	0.182	0.182	0.137	0.137	0.565	0.454
S-11	0.424	0.424	0.284	0.284	0.284	0.212	0.212	0.593	0.477
S-12	0.554	0.554	0.379	0.379	0.379	0.284	0.284	0.775	0.623
S-13	0.736	0.736	0.492	0.492	0.492	0.366	0.366	1.031	0.828
S-16A	1.473	1.473	0.980	0.980	0.980	0.736	0.736	2.062	1.657
S-17	1.881	1.881	1.257	1.257	1.257	1.046	1.046	2.634	2.116
S-17A	1.960	1.960	0.811	0.811	0.811	0.614	0.614	2.744	2.205
S-18A	2.209	2.209	1.473	1.473	1.473	1.102	1.102	3.093	2.485
S-22	5.891	5.891	3.930	3.930	3.930	2.945	2.945	8.248	6.628

1. If applicable and based on the occupancy, the BCEGS grade may either be the “1 and 2 family” or the “all other” grade.

2. BCEGS Factors apply only to the Special Class “Other Structures” occupancy listing.

D. **Limit of Insurance**

1. Completed Value Builders' Risk Changes Form – *CIT-W 11 20* - The limit of insurance should contemplate the full value of the described property at the date of completion, including all permanent fixtures and decorations that constitute a part of the building. Must also comply with construction "starts". Failure to maintain the proper limit of insurance may cause the insured to incur a coinsurance penalty.

2. Builders' Risk Change Form – *CIT-W 11 19* - The limit of insurance will not contemplate the full value of the described property at the date of completion, including all permanent fixtures and decorations that constitute a part of the building and does not comply with construction "starts". Citizens will insure only to other wind only applicable maximum limit. The full value as described should be indicated in the underwriting section of the application to determine the appropriate coinsurance percentage or waiver of coinsurance. Failure to indicate the proper limit of insurance and the full value of the risk(s) as described may cause the insured to incur a coinsurance penalty.

   Subject to approval of Citizens, if the limit of insurance is increased during the term of the policy, compute the premium for the increased limit <u>from the inception date</u> of the policy to expiration.

   NOTE: Contract price does not necessarily equal the full value at completion.

3. Coverage Limits are based on the occupancy when completed. See Maximum Coverage Available section. Residential and Commercial-Residential Properties coverage amount subject to the maximum limit rules, may exceed the standard maximum limits so that insuring to 100% at completed value is complied with.

   The Completed Value Endorsement (CIT-W11 20) may not be used on commercial non-residential policies where the insurable value exceeds the program's maximum limit.

E. **Policy Inception Date and Policy Term**

1. Policy Inception Date - Select an inception date which is not later than:
   a. the date construction starts above the level of the lowest basement floor; or
   b. the date construction starts, if there is no basement.

2. Effective Date rules apply. If the effective date of the policy does not comply with Rule **E.1** above, use Table **BR-B**.
   a. You <u>may not</u> use the "Completed Value" - Table **BR-A**.
   b. You <u>may not</u> apply a 100% coinsurance credit to the rates in Table **BR-B**.

3. Policy Term - Issue policies for a one (1) year term.

4. One building per policy. More than 1 building per policy may be issued if located on the same premises, with approval of Citizens.

5. Upon completion of construction or issuance of a certificate of occupancy, the policy must be canceled. (Coverage for the completed structure must be submitted on a new application).

6. **Deductible** - Commercial Policy deductible is applicable. The percentage (%) of value for the purpose of calculating the deductible amount is the completed value of the risk, regardless of the actual construction period.

7. Actual Cash Value Loss Settlement Option <u>not</u> available.

8. Wind Storm Protection Devices Credit <u>not</u> available.

3. Premium Determination – Wind Only Policies

A. Determine Rate Table corresponding to the Builders' Risk form applicable.

B. Builders' Risk Changes - Commercial Form – *CIT-W 11 20* - Completed Value - use Table **<u>BR-A</u>**. (Make no modification for coinsurance).

C. Builders' Risk Changes - Commercial Form – *CIT-W 11 19* - 80% Coinsurance Rates - use Table **<u>BR-B</u>.**

D. From the appropriate rate table, determine the rate, based on occupancy class, territory and construction. Multiply the applicable "Rate Modifiers" to each combined (single rate) Hurricane, and Other Windstorm or Hail (OWH) rate.

1. **Rate Modifiers** - (each is expressed as a component of each combined Hurricane and OWH rate) - apply sequentially.

2. **Optional Deductible Factor - multiply** each **combined** Hurricane and OWH Optional Deductible factor times each rate, rounded to three (3) places.

3. **Coinsurance Factor - 90%** Coinsurance - if value of property exceeds an amount which complies with 100% of completed value, **90%** coinsurance may be selected: Use Builders' Risk Rate Table **<u>BR-B</u>** - apply the coinsurance credit by multiplying the rate by **.95**, rounded to three (3) places. (90% coinsurance credit is 5%.)

4. **BCEGS** - The BCEGS factor is not applicable to builders' risk issued on the commercial policy.

E. When mixed occupancies are in the same "building", determine from the "Occupancy List", the appropriate rate table for each occupancy. Disregard any occupancy which represents 25% or less of the total floor area of the building. Select the rate table which has the highest rate, based on territory and construction.

F. **Multiply** the combined Hurricane and OWH rate (rate per $1,000) times the limit of liability to develop a premium for each risk insured.

G. **First Loss Rule Table** - If the amount of insurance selected or if the completed value of property exceeds an amount which permits compliance with the 80% or 90% coinsurance clause, and 80% or 90% coinsurance is not accepted, the "First Loss" Rule may be used.

H. Total the premium(s) of the risk(s) to be insured on the policy (the "base" premium).

I. Apply the appropriate surcharge(s) (e.g. Catastrophe Reinsurance Surcharge of 15% and Tax-Exempt Surcharge of 1.75%) to the "base" policy premium developed to determine the total policy premium.

J. Wind Protective Device(s) credits do not apply.

7. Rate Tables

Rate Table: BR-A
Builders' Risk - Completed Value

Deductible: 3% of Value (Minimum $1,000)

Combined Hurricane and Other Wind Rate per $1,000

	Territory								
Occupancy	30-38, 77, 87	76	41, 56, 57, 64, 69, 74, 88	42, 59, 60, 62, 70-73, 75	58, 61, 63, 65-68	43, 79, 80, 81	44, 78	85, Monroe Remainder	86, city of KEY WEST ONLY
1. **Dwellings, Commercial-Residential Occupancy (one story in height)** • Boarding Houses • Modular Structures • Fraternity and Sorority Houses • Hotel/Motels (one story in height or not exceeding 4 bedrooms for guests in a single building. • Nurses and Sisters' home									
A) Wind Resistive	1.600	1.600	1.090	1.090	1.090	0.800	0.800	2.220	1.890
B) Semi-Wind Resistive	2.070	2.070	1.370	1.370	1.370	0.990	0.990	2.780	2.360
C) Masonry	2.550	2.550	1.690	1.690	1.690	1.280	1.280	3.350	2.860
D) Frame	2.550	2.550	1.690	1.690	1.690	1.280	1.280	3.350	2.860
2. **Commercial-Residential Occupancy (Two or more stories in height)** • Bath and Commercial Clubs, Hotels and Motels (Two or more stories in height and exceeding 4 bedrooms for guests in a single building)									
A) Wind Resistive	3.730	3.730	1.090	1.090	1.090	0.800	0.800	3.920	1.980
B) Semi-Wind Resistive	4.150	4.150	1.370	1.370	1.370	0.990	0.990	5.810	2.930
C) Masonry	5.180	5.180	1.690	1.690	1.690	1.280	1.280	7.140	4.010
D) Frame	6.380	6.380	2.810	2.810	2.810	2.100	2.100	8.920	5.400
3. **All Other Commercial Risks not carrying completed building Special Class rates**									
A) Wind Resistive	1.800	1.800	1.090	1.090	1.090	0.800	0.800	2.600	2.100
B) Semi-Wind Resistive	2.500	2.500	1.370	1.370	1.370	0.990	0.990	3.550	3.050
C) Masonry	4.190	4.190	1.690	1.690	1.690	1.280	1.280	5.690	4.100
D) Frame	5.710	5.710	2.810	2.810	2.810	2.100	2.100	7.690	5.500
4. **Risks carrying completed building Special Class rates-multiply Special Class rates as shown:**									
Limit such rates to the following:	0.743	0.743	0.743	0.743	0.743	0.743	0.743	1.040	0.891
A) Wind Resistive	None	None	None	None	None	None	None	8.900	4.450
B) Semi-Wind Resistive	None	None	None	None	None	None	None	13.350	6.670
C) Masonry	None	None	None	None	None	None	None	15.530	8.640
D) Frame	None	None	None	None	None	None	None	19.390	11.590

Rate Table: BR-B
Builders' Risk - 80% Coinsurance Rates

Deductible: 3% of Value (Minimum $1,000)

Combined Hurricane and Other Wind Rate per $1,000

	Territory								
Occupancy	30-38, 77, 87	76	41, 56, 57, 64, 69, 74, 88	42, 59, 60, 62, 70-73, 75	58, 61, 63, 65-68	43, 79, 80, 81	44, 78	85, Monroe Remainder	86, city of KEY WEST ONLY
1. **Dwellings, Commercial-Residential Occupancy (one story in height)** • Boarding Houses • Modular Structures • Fraternity and Sorority Houses • Hotel/Motels (one story in height or not exceeding 4 bedrooms for guests in a single building. • Nurses and Sisters' home									
A) Wind Resistive	3.240	3.240	2.200	2.200	2.200	1.620	1.620	4.480	3.820
B) Semi-Wind Resistive	4.190	4.190	2.760	2.760	2.760	2.000	2.000	5.620	4.770
C) Masonry	5.160	5.160	3.410	3.410	3.410	2.580	2.580	6.770	5.770
D) Frame	5.160	5.160	3.410	3.410	3.410	2.580	2.580	6.770	5.770
2. **Commercial-Residential Occupancy (Two or more stories in height)** - Bath and Commercial Clubs, Hotels and Motels (Two or more stories in height and exceeding 4 bedrooms for guests in a single building)									
A) Wind Resistive	7.540	7.540	2.200	2.200	2.200	1.620	1.620	7.910	4.000
B) Semi-Wind Resistive	8.390	8.390	2.760	2.760	2.760	2.000	2.000	11.730	5.910
C) Masonry	10.460	10.460	3.410	3.410	3.410	2.580	2.580	14.430	8.110
D) Frame	12.890	12.890	5.680	5.680	5.680	4.240	4.240	18.030	10.910
3. **All Other Commercial Risks not carrying completed building Special Class rates**									
A) Wind Resistive	3.630	3.630	2.200	2.200	2.200	1.620	1.620	5.250	4.250
B) Semi-Wind Resistive	5.060	5.060	2.760	2.760	2.760	2.000	2.000	7.180	6.170
C) Masonry	8.470	8.470	3.410	3.410	3.410	2.580	2.580	11.490	8.280
D) Frame	11.530	11.530	5.680	5.680	5.680	4.240	4.240	15.530	11.120
4. **Risks carrying completed building Special Class rates-multiply Special Class rates as shown:**									
Limit such rates to the following:	1.500	1.500	1.500	1.500	1.500	1.500	1.500	2.100	1.800
A) Wind Resistive	None	None	None	None	None	None	None	8.900	4.450
B) Semi-Wind Resistive	None	None	None	None	None	None	None	13.350	6.670
C) Masonry	None	None	None	None	None	None	None	15.530	8.640
D) Frame	None	None	None	None	None	None	None	19.390	11.590

II. COVERAGE

1. Perils – Coverage may be afforded only for direct loss by Hurricane, other Windstorm, or Hail to property as defined in the Citizens wind only policy forms. Hurricane, other Windstorm or Hail coverage may not be purchased individually or separately.

2. Coverage Limits

A. **Commercial-Residential** (Commercial-Residential Policy)

Standard Maximum limit for commercial-residential is $10,000,000. Citizens may write a commercial-residential risk with limits above $10,000,000 if coverage is not available in an authorized market.

Deleted: The *Market Availability Document* (MAD form) is a required document and must be submitted with the application. The *Market Availability Document* (MAD Form) is available on Citizens' website.

This limit applies as follows:

1. Building only; or
2. Contents only; or
3. Building and contents.

Deleted: written for the same "location", whether on the same policy or not, and regardless of named insured.

Individual risk submission is required for any scheduled building with a replacement cost that exceeds $10,000,000.

Deleted: risk

Deleted: requesting building limits above $10,000,000 aggregate for all scheduled buildings at the same "location" for the same insured (Refer to individual risk submission VIII.7).¶

B. **Commercial Property** (Commercial Policy)

Maximum limit for other commercial properties will not exceed $1,000,000 per insured per location.

This limit applies as follows:

1. Building only; or
2. Contents only; or
3. Building and contents.

Deleted: <#>Building and contents written for the same "location", whether on the same policy or not, and regardless of named insured.¶

C. **Mobile Homes** (Commercial Policy)

Maximum limit will not exceed $1,000,000.

Deleted: at any one location for all insured interests

This limit applies as follows:

1. Building only; or
2. Contents only; or
3. Building and contents.

Deleted: written for the same "location", whether on the same policy or not, and regardless of named insured.

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D. **General Rules**

1. Wind policy limits may be increased at renewal or mid-term. Payment is required in accordance with applicable procedures, rules and rate schedules.
2. Citizens Wind Limits will be written as the primary layer and must be continuous. For example, we will not provide the first and third layers of limits.
3. Limits below $1,000,000 for a building and its contents are not available unless the value is also below $1,000,000. For example, if the value of a dwelling is $6,000,000, we will not insure it at $50,000 or $25,000. It must be insured for at least a minimum of $1,000,000. This applies to all occupancies.
4. First Loss Procedures apply to rating and policy conditions on risks when we do not insure to full value. See First Loss Procedures.
5. Limits in excess of the Standard Maximum Limits are not available for mobile home or non-residential commercial business.

3. Coverage Forms

A. Coverage is afforded only through the forms and endorsements found on the Citizens' website.

B. Additional Living Expense, Ordinance or Law, Tenant Building Alterations and Additions and Loss Assessment may be found in the Dwelling Wind Only Policy. Refer to the Dwelling Wind Only Policy for applicable description and limits.

C. Reporting Form, Blanket Insurance, Time Element, Consequential Loss and similar coverages are not available under any Commercial Wind Only Policy, Commercial-Residential Wind Only Policy, or Dwelling Wind Only Policy, unless stipulated in the policy form.

- Pay 40% of the policy premium plus 4% interest of the 2nd installment by the 180th day of the policy term.

Interest is charged at a rate of 4% per scheduled installment, subsequent to the first installment, which will not exceed approximately 8.5% simple interest per year on the unpaid balance. If the policy is cancelled, 100% of the interest will be refunded.

Lienholders, Mortgagees (e.g. Escrow) and Premium Finance Companies are not eligible for the Quarterly or Semi Annual payment plans.

5. Renewals

A. In order to continue wind-only coverage without interruption, the required premium must be received by Citizens before the expiration date. Premium payments received after the expiration date will become effective the day of receipt of the full premium, **subject to the Tropical Storm and Hurricane Restriction Rule**, and any applicable coverage, rate or rule changes.

B. Payment received later than ninety (90) days after expiration will not be accepted. Coverage must be rewritten and a new application must be submitted including required documents.

6. Annual Increase Limits Program

The Direct Bill Notice may reflect increases effective the inception of the renewed policy term for increased "cost of construction" on building, contents and other structure coverage amounts over $10,000. This increase construction factor is not applicable to mobile homes and its contents, risks using the "First Loss" rule, or policy amounts which have reached a maximum limit.

7. Policy Changes

A. Agents should submit policy change requests in writing to Citizens. Change requests become effective upon approval of Citizens.

B. Wind only policy change requests for increased coverage or additional coverage are effective at 12:01 A.M., Eastern Standard Time, (EST) the earlier of the day of receipt of the request or facsimile receipt of the request by Citizens at the Jacksonville office or at such later date as specified within the request and upon approval of Citizens.

1. Citizens will invoice, if an additional premium is required.
2. Payment of the full additional premium must be received by Citizens on or before the due date stipulated on the "*Endorsement Premium Due*" notice.
3. If the policy cancels, coverage must be rewritten with submission of a new complete application for coverage including required documents.

C. All changes shall be made using the rules and rates in effect at the inception of the policy or latest subsequent renewal date.

D. Policies may not be canceled and rewritten to circumvent forthcoming rate, rule, coverage or surcharge changes.

8. Cancellations and Nonrenewals

A. Cancellations shall be on a pro rata basis, subject to the rules below. Citizens disregards February 29th in leap years when determining return premiums.

B. By Policyholder – Wind Only Policies:

Cancellation requests must be in writing and provided on one of the following documents, which must be signed by all Named Insureds:

- Insured's Copy of Declarations Page
- *CIT F116 - Policy Release/Cancellation Request* (found in the Appendix)
- ACORD - Cancellation Request/Policy Release
- Letter from the first Named Insured
- Copy of Closing Notice signed by the Named Insured

C. Return Premiums – Wind Only Policies:

1. Return premium is pro rata under the following conditions:

   a. Citizens cancels the policy or reduces the coverage.

   b. The insured property is moved out of the eligible area.

   c. Coverage is rewritten with Citizens.

   NOTE: $100.00 retained premiums are for the wind only Commercial and Commercial-Residential policies. The Tax-Exempt Surcharge is not subject to the retained premium rule.

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2. If a policy is cancelled by the insured, the policy is cancelled for non-payment of premium to a Premium Finance Company, or if the insured reduces the amount of insurance, return premium is pro rata if no coverage existed from June 1 to November 1. If coverage existed at any time from June 1 to November 1, the return premium is computed as follows:

1 YEAR POLICY	
DAYS POLICY IN FORCE	UNEARNED FACTOR
1 to 180	0.200
181 to 210	0.150
211 to 240	0.100
241 to 270	0.075
271 to 300	0.050
301 to 330	0.025
331 to 365	0.000

In addition, any current Citizens policyholder who replaces their Citizens policy with a policy that provides coverage including wind for anything less than a full annual term will be subject to the 80% minimum earned premium rule.

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VI. Commissions

Commercial and Commercial-Residential Wind Only (Commercial and Commercial-Residential Policies):

1. Agent's commission for new and renewal business is derived from:

   a. actual premium; and

   b. if a minimum premium, the minimum premium

2. There is no commission on premium surcharges (i.e., catastrophe reinsurance surcharge, etc.) or the Florida Hurricane Catastrophe Fund Build-Up premium.

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Modified Fire Resistive (code 5)

Buildings where the exterior walls and the floors and roof are constructed of masonry or fire resistive materials with a fire resistance rating of one hour or more but less than two hours.

Fire Resistive (code 6)

Building where the exterior walls and the floors and roof are constructed of masonry or fire resistive materials having a fire resistance rating of not less than two hours.

Superior Masonry/Heavy Timber (code 7)

Joisted masonry buildings where the entire roof is a minimum of 2 inches in thickness and is supported by timbers having a minimum dimension of 6 inches; or, where the entire roof assembly is documented to have a wind uplift classification of 90 or equivalent.

Superior Noncombustible (code 8)

Noncombustible buildings where the entire roof is constructed of 22 gauge metal (or heavier) on steel supports; or, where the entire roof is constructed of 2 inches of masonry on steel supports; or, where the entire roof assembly is documented to have a wind uplift classification of 90 or equivalent.

Superior Masonry Noncombustible (code 9)

Masonry noncombustible buildings where the entire roof is constructed of 2 inches of masonry on steel supports; or, when the entire roof is constructed of 22 gauge metal (or heavier) on steel supports; or, where the entire roof assembly is documented to have a wind uplift classification of 90 or equivalent.

3. Commercial Residential Windstorm Mitigation Definitions

A. **Terrain Exposure Category Definitions**

Apply Exposure Category (terrain) definitions from the Florida Building Code as follows:

Exposure C (open terrain with scattered obstructions) applies to:

1. All locations in HVHZ (Miami-Dade and Broward Counties); including.

2. Barrier islands as defined per s. 161.55(4), Florida Statutes, as the land area from the seasonal high water line to a line 5,000 feet landward from the Coastal Construction Control line.

3. All other areas with 1,500 feet of the coastal construction control line, or within 1,500 feet of the mean high tide line, whichever is less.

4. All other Citizens High Risk Account (Wind Only) eligible insuring areas.

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B. **Building Types**

- **Type I** - Buildings that are 3 stories or less.
- **Type II** - Buildings that are 4 to 6 stories.
- **Type III** - Buildings that are 7 stories or more.

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VIII. GENERAL RATING RULES – WIND ONLY POLICIES

1. General application of rates, rules, deductibles, policy forms and other associated rate credit/debit factors.

A. Rates, rules and other associated factors generally follow the specific occupancy classifications found in the rating and classification sections of this manual.

B. Deductible and policy form application follows the risk(s) occupancy classification.

1. However, when an auxiliary or commercial building or structure at the same location (premises) for the same insured is in conjunction with a commercial-residential occupancy (regardless of whether Citizens insures it or not), the policy form and deductible schedule follows the commercial-residential occupancy.

2. For example, a condominium office building used to service a residential condominium will use the commercial-residential deductible schedule and policy form, regardless of whether the primary condominium building is insured with Citizens or not.

3. Contact your Citizens wind only underwriter when additional classification is needed.

2. Term and Rating Territory Numbers –Wind Only Policies

A. All rates and premiums are for an annual term.

B. Territory numbers used to rate are listed in the wind only Commercial-Residential and Commercial Rating Territories in this section and correspond to designated "eligible areas".

3. Rate and Premium Rounding – Waiver of Premium

A. Round rates after each calculation to three decimal places. Five tenths or more of a mill shall be considered one mill.

B. Round each premium calculation in the policy to the nearest whole dollar, with $.50 or more rounded to the next highest dollar.

C. All rates are per $1,000 of coverage.

4. Policy Minimum Premiums – Wind Only policies

A. Wind only Commercial Policy and Commercial-Residential Policy: **$200; $100** of premium is retained and fully earned (any exceptions are listed in Cancellation section).

B. Minimum premiums apply to policy premium, not individually to separately scheduled policy items. In commercial residential the minimum premium applies to the aggregate Adjusted Subtotal for the policy.

C. Reference the "Surcharges" section of this manual, as they may or may not apply to Minimum Premiums

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7. Individual Risk Submission

A. Individual Risk Submission - (Commercial-Residential Policies)

Citizens will determine eligibility for coverage and a risk-specific rate. Citizens will require individual risk submission of the following:

1. Any risk with a replacement cost that exceeds $10,000,000 for any scheduled building.

2. Any risk in which the construction, condition, or location of the property is such that Citizens may choose to determine a rate and premium adequate for this exposure.

B. Individual risk submissions shall be submitted at least 30 business days prior to the requested effective date of coverage for individual risk rating, and shall be administered as an "individually rated" exposure in accordance with Florida Statute 627.062(3).

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8. Other Coverages

A. Replacement Cost Coverage - (Commercial and Commercial-Residential Policies)

1. The policy provides loss settlement for building losses on a repair or replacement cost basis subject to certain conditions. Replacement cost coverage is not applicable to mobile homes which are settled on an Actual Cash Value (ACV) basis.

2. **ELIGIBILITY** - Replacement Cost Coverage is provided in the policy form for buildings and other structures. This includes building items of real property, including additions and alterations of a unit which is the commercial tenant's insurance responsibility, commercial unit owner building items described as "CONTENTS, ALTERATIONS, APPLIANCES, FIXTURES AND IMPROVEMENTS" which pertain exclusively to the condominium unit, commercial-residential buildings, builders' risks, commercial buildings and special class occupancies that are buildings or other structures. **Replacement Cost coverage is NOT applicable to contents or mobile homes.**

3. Coverage limits selected must represent 100% of the replacement value unless limited by the standard maximum policy limits available. Property not eligible for replacement cost coverage will be written on an ACV basis and may be insured from 80% to 100% of ACV.

4. When the ACV Option has been selected and the insured elects to endorse the insured property to replacement cost coverage, replacement coverage may be requested at renewal, midterm, or on new applications for coverage subject to approval by Citizens. This may result in additional premium due.

5. Guaranteed Replacement Cost Coverage is not available.

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2. Rate Tables

Rate Table: **CC-D** Commercial Policy

Motel, Hotel buildings-Contents of Motel and Hotel buildings one story high (or not over 4 guest bedrooms per building) (Not Commercial-Residential)

Deductible: 3% of Value (Minimum $1,000)

NOTE: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory		BUILDING Base Rate Per $1,000 Combined Hurricane and Other Wind				CONTENTS Base Rate Per $1,000 Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	3.445	3.158	1.960	1.386	3.158	3.158	1.960	1.270
60	Brevard	3.445	3.445	2.138	1.386	3.158	3.158	1.960	1.270
35	Broward	5.359	5.359	3.154	2.138	5.359	4.912	2.891	1.960
36	Broward	5.359	5.359	3.154	2.138	5.359	5.359	3.154	2.138
37	Broward	5.359	5.359	3.154	2.138	5.359	4.912	2.891	1.960
61	Charlotte	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
62	Collier	3.445	3.445	2.138	1.386	3.445	3.312	1.966	1.386
30	Dade	5.359	5.359	3.154	2.138	5.359	5.359	3.154	2.138
31	Dade	5.359	5.359	3.154	2.138	5.359	5.359	3.154	2.138
32	Dade	5.359	5.359	3.154	2.138	5.359	4.941	2.891	1.960
34	Dade	5.359	5.359	3.154	2.138	5.359	4.912	2.891	1.960
41	Duval	2.955	2.955	1.834	1.189	2.955	2.955	1.834	1.189
43	Escambia	2.376	2.376	1.386	1.016	2.178	2.178	1.270	0.931
63	Escambia	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
64	Flagler	2.955	2.955	1.834	1.189	2.955	2.955	1.834	1.189
78	Flagler	2.178	2.178	1.270	0.931	2.178	2.178	1.270	0.931
65	Franklin	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
66	Gulf	3.445	3.158	2.055	1.386	3.158	3.158	1.960	1.270
56	Hernando	3.158	3.158	1.960	1.270	3.158	3.158	1.960	1.270
76	Indian River	5.359	4.912	3.154	2.138	4.912	4.912	2.891	1.960
67	Lee	3.445	3.445	2.138	1.386	3.445	3.158	1.960	1.386
79	Lee	2.343	2.178	1.357	1.016	2.178	2.178	1.270	0.931
57	Levy	3.158	3.158	1.970	1.386	3.158	3.158	1.960	1.270
68	Manatee	3.445	3.445	2.138	1.386	3.445	3.245	2.138	1.386
85	Monroe	7.497	7.497	4.395	2.904	7.497	6.872	4.395	2.904
86	Monroe	6.428	6.428	3.775	2.508	6.428	6.428	3.775	2.508
69	Nassau	2.955	2.955	1.834	1.189	2.955	2.955	1.834	1.189
70	Okaloosa	3.445	3.445	2.138	1.386	3.219	3.158	1.960	1.384
38	Palm Beach	5.359	5.330	3.154	2.138	4.912	4.912	2.891	1.960
87	Palm Beach	5.359	5.359	3.154	2.138	5.359	4.921	3.154	2.138
88	Pasco	3.158	3.158	1.960	1.270	3.158	3.158	1.960	1.270
42	Pinellas	3.445	3.445	2.138	1.386	3.445	3.421	2.138	1.386
71	Saint Johns	3.097	3.097	1.922	1.246	3.097	3.097	1.922	1.246
77	Saint Lucie	5.359	5.218	3.154	2.138	4.912	4.912	2.891	1.960
72	Santa Rosa	3.445	3.445	2.138	1.386	3.445	3.158	2.138	1.386
80	Santa Rosa	2.376	2.376	1.386	1.016	2.376	2.178	1.386	1.016
73	Sarasota	3.445	3.248	2.138	1.386	3.158	3.158	1.960	1.270
81	Sarasota	2.376	2.376	1.386	1.016	2.178	2.178	1.270	0.931
44	Volusia	2.100	2.100	1.225	0.898	2.100	2.100	1.225	0.898
74	Volusia	3.158	3.158	1.960	1.334	3.158	3.158	1.960	1.270
58	Wakulla	3.158	3.158	1.960	1.270	3.158	3.158	1.960	1.270
75	Walton	3.445	3.445	2.138	1.386	3.265	3.158	1.960	1.270

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Rate Table: **CC-E** Commercial Policy

Motel, Hotel buildings-Contents of Motel and Hotel buildings (over one story high and over 4 guest bedrooms per building) (Not Commercial-Residential)

Deductible: 3% of Value (Minimum $1,000)

NOTE: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory		BUILDING Base Rate Per $1,000 Combined Hurricane and Other Wind				CONTENTS Base Rate Per $1,000 Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	4.356	3.158	1.960	1.386	4.356	3.158	1.960	1.270
60	Brevard	4.699	3.445	2.138	1.386	4.356	3.158	1.960	1.270
35	Broward	7.972	6.903	5.892	5.420	7.308	6.328	5.892	5.420
36	Broward	7.972	6.903	6.428	5.913	7.972	6.458	5.892	5.420
37	Broward	7.972	6.584	5.892	5.420	7.308	6.328	5.892	5.420
61	Charlotte	4.752	3.445	2.138	1.386	4.653	3.159	2.138	1.386
62	Collier	4.752	3.445	2.138	1.386	4.752	3.322	1.973	1.386
30	Dade	7.972	6.903	6.428	5.548	7.972	6.328	5.892	5.420
31	Dade	7.972	6.903	6.405	5.513	7.972	6.328	5.892	5.420
32	Dade	7.972	6.903	5.892	5.420	7.757	6.328	5.892	5.420
34	Dade	7.972	6.606	5.892	5.420	7.308	6.328	5.892	5.420
41	Duval	4.076	2.955	1.834	1.189	4.076	2.955	1.834	1.189
43	Escambia	3.195	2.376	1.386	1.016	3.158	2.178	1.270	0.931
63	Escambia	4.752	3.445	2.138	1.386	4.491	3.158	2.138	1.386
64	Flagler	4.076	2.955	1.834	1.189	4.076	2.955	1.834	1.189
78	Flagler	3.158	2.178	1.270	0.931	3.158	2.178	1.270	0.931
65	Franklin	4.752	3.445	2.138	1.386	4.356	3.158	2.138	1.386
66	Gulf	4.356	3.158	2.059	1.386	4.356	3.158	1.960	1.270
56	Hernando	4.356	3.158	1.960	1.270	4.356	3.158	1.960	1.270
76	Indian River	7.308	6.328	5.892	5.420	7.308	6.328	5.892	5.420
67	Lee	4.752	3.445	2.138	1.386	4.356	3.158	1.960	1.386
79	Lee	3.158	2.178	1.359	1.016	3.158	2.178	1.270	0.931
57	Levy	4.356	3.158	1.974	1.386	4.356	3.158	1.960	1.270
68	Manatee	4.752	3.445	2.138	1.386	4.748	3.254	2.138	1.386
85	Monroe	11.180	9.108	8.191	6.340	10.248	8.833	8.191	6.340
86	Monroe	7.972	6.428	5.280	4.395	7.972	6.428	4.840	4.029
69	Nassau	4.076	2.955	1.834	1.189	4.076	2.955	1.834	1.189
70	Okaloosa	4.752	3.445	2.138	1.386	4.356	3.158	1.960	1.386
38	Palm Beach	7.308	6.328	5.892	5.420	7.308	6.328	5.892	5.420
87	Palm Beach	7.972	6.903	6.388	5.420	7.332	6.328	5.892	5.420
88	Pasco	4.356	3.158	1.960	1.270	4.356	3.158	1.960	1.270
42	Pinellas	4.752	3.445	2.138	1.386	4.752	3.432	2.138	1.386
71	Saint Johns	4.272	3.097	1.922	1.246	4.272	3.097	1.922	1.246
77	Saint Lucie	7.308	6.328	5.892	5.420	7.308	6.328	5.892	5.420
72	Santa Rosa	4.752	3.445	2.138	1.386	4.620	3.158	2.138	1.386
80	Santa Rosa	3.445	2.376	1.386	1.016	3.158	2.178	1.386	1.016
73	Sarasota	4.371	3.253	2.138	1.386	4.356	3.158	1.960	1.270
81	Sarasota	3.445	2.376	1.386	1.016	3.158	2.178	1.270	0.931
44	Volusia	3.045	2.100	1.225	0.898	3.045	2.100	1.225	0.898
74	Volusia	4.356	3.158	1.960	1.336	4.356	3.158	1.960	1.270
58	Wakulla	4.356	3.158	1.960	1.270	4.356	3.158	1.960	1.270
75	Walton	4.752	3.445	2.138	1.386	4.356	3.158	1.960	1.270

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Rate Table: **CC-F** Commercial Policy

All other commercial buildings including commercial condominiums except Special Class, Builder's Risk, Commercial-Residential and other occupancies listed in this section and contents therein (i.e. office, mercantile, parking garage, bank, restaurant, church, grocery store, etc.).

Deductible: 3% of Value (Minimum $1,000)

NOTE: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory		BUILDING Base Rate Per $1,000 Combined Hurricane and Other Wind				CONTENTS Base Rate Per $1,000 Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
60	Brevard	4.670	3.448	2.270	1.465	4.670	3.448	2.081	1.343
35	Broward	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
36	Broward	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.270
37	Broward	7.343	5.467	3.471	2.270	7.114	5.227	3.182	2.081
61	Charlotte	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.419
62	Collier	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.343
30	Dade	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
31	Dade	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
32	Dade	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
34	Dade	7.345	5.484	3.458	2.270	7.114	5.227	3.182	2.081
41	Duval	4.370	3.227	1.947	1.257	4.370	3.227	1.947	1.257
43	Escambia	3.448	2.335	1.465	1.069	3.448	2.335	1.343	0.980
63	Escambia	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.343
64	Flagler	4.370	3.227	1.947	1.257	4.370	3.227	1.947	1.257
78	Flagler	3.448	2.335	1.343	0.980	3.448	2.335	1.343	0.980
65	Franklin	4.785	3.625	2.270	1.465	4.670	3.448	2.081	1.400
66	Gulf	4.670	3.448	2.081	1.427	4.670	3.448	2.081	1.343
56	Hernando	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
76	Indian River	7.114	5.227	3.182	2.270	7.114	5.227	3.182	2.081
67	Lee	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.343
79	Lee	3.448	2.335	1.343	0.980	3.448	2.335	1.343	0.980
57	Levy	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
68	Manatee	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.465
85	Monroe	10.089	7.562	4.936	3.339	9.897	7.235	4.525	3.061
86	Monroe	8.487	6.784	4.276	2.798	7.780	6.219	3.920	2.565
69	Nassau	4.370	3.227	1.947	1.257	4.370	3.227	1.947	1.257
70	Okaloosa	4.670	3.448	2.270	1.465	4.670	3.448	2.081	1.343
38	Palm Beach	7.114	5.227	3.182	2.270	7.114	5.227	3.182	2.081
87	Palm Beach	7.761	5.702	3.471	2.270	7.114	5.227	3.182	2.081
88	Pasco	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
42	Pinellas	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.465
71	Saint Johns	4.580	3.382	2.041	1.317	4.580	3.382	2.041	1.317
77	Saint Lucie	7.114	5.227	3.471	2.270	7.114	5.227	3.182	2.081
72	Santa Rosa	5.095	3.762	2.270	1.465	4.670	3.448	2.081	1.395
80	Santa Rosa	3.762	2.547	1.465	1.069	3.448	2.335	1.343	0.980
73	Sarasota	4.670	3.448	2.081	1.465	4.670	3.448	2.081	1.343
81	Sarasota	3.448	2.516	1.465	1.069	3.448	2.335	1.343	0.980
44	Volusia	3.325	2.252	1.295	0.945	3.325	2.252	1.295	0.945
74	Volusia	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
58	Wakulla	4.670	3.448	2.081	1.343	4.670	3.448	2.081	1.343
75	Walton	4.670	3.448	2.081	1.465	4.670	3.448	2.081	1.343

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Rate Table: **CC-G** Commercial Policy

Nursing Home, Dormitory, Sorority and Fraternity House buildings, Boarding House buildings which are nonowner are nonowner occupied and less than 5 roomers - contents therein.

Deductible: 3% of Value (Minimum $1,000)

NOTE: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory		BUILDING Base Rate Per $1,000 Combined Hurricane and Other Wind				CONTENTS Base Rate Per $1,000 Combined Hurricane and Other Wind			
Number	Description	Frame	Masonry	SWR	WR	Frame	Masonry	SWR	WR
59	Bay	2.085	2.085	1.911	1.694	1.386	1.270	1.270	1.149
60	Brevard	2.085	2.085	2.085	1.848	1.386	1.386	1.270	1.149
35	Broward	3.141	3.141	3.154	2.719	2.085	2.085	1.911	1.669
36	Broward	3.141	3.141	3.154	2.719	2.085	2.085	2.085	1.821
37	Broward	3.141	3.141	3.154	2.719	2.085	2.085	1.911	1.669
61	Charlotte	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
62	Collier	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
30	Dade	3.141	3.141	3.154	2.719	2.085	2.085	2.085	1.821
31	Dade	3.141	3.141	3.154	2.719	2.085	2.085	2.085	1.821
32	Dade	3.141	3.141	3.154	2.719	2.085	2.085	1.917	1.669
34	Dade	3.141	3.141	3.154	2.719	2.085	2.085	1.911	1.669
41	Duval	1.789	1.789	1.789	1.585	1.189	1.189	1.189	1.076
43	Escambia	1.386	1.386	1.386	1.254	0.937	0.937	0.834	0.762
63	Escambia	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
64	Flagler	1.952	1.789	1.789	1.585	1.189	1.189	1.189	1.076
78	Flagler	1.386	1.384	1.270	1.149	0.937	0.859	0.834	0.762
65	Franklin	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
66	Gulf	2.085	2.085	1.911	1.694	1.386	1.386	1.270	1.149
56	Hernando	2.085	1.911	1.911	1.694	1.270	1.270	1.270	1.149
76	Indian River	3.141	3.141	3.121	2.548	2.085	2.085	1.911	1.669
67	Lee	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
79	Lee	1.386	1.386	1.270	1.149	0.937	0.859	0.834	0.762
57	Levy	2.085	2.025	1.911	1.694	1.386	1.270	1.270	1.149
68	Manatee	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
85	Monroe	4.395	4.395	4.395	3.814	2.943	2.943	2.943	2.521
86	Monroe	3.933	3.933	3.933	3.392	2.626	2.626	2.626	2.257
69	Nassau	1.789	1.789	1.789	1.585	1.189	1.189	1.189	1.076
70	Okaloosa	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.238
38	Palm Beach	3.141	3.141	3.154	2.719	2.085	2.085	1.911	1.669
87	Palm Beach	3.141	3.141	3.154	2.719	2.085	2.085	2.085	1.821
88	Pasco	2.085	1.911	1.911	1.694	1.270	1.270	1.270	1.149
42	Pinellas	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
71	Saint Johns	1.875	1.875	1.875	1.661	1.246	1.246	1.246	1.127
77	Saint Lucie	3.141	3.141	3.154	2.719	2.085	2.085	2.061	1.669
72	Santa Rosa	2.085	2.085	2.085	1.848	1.386	1.386	1.386	1.254
80	Santa Rosa	1.386	1.386	1.386	1.254	0.937	0.937	0.910	0.831
73	Sarasota	2.085	2.085	2.085	1.834	1.386	1.386	1.270	1.149
81	Sarasota	1.386	1.386	1.386	1.254	0.937	0.937	0.845	0.762
44	Volusia	1.337	1.225	1.225	1.108	0.842	0.828	0.805	0.735
74	Volusia	2.085	1.914	1.911	1.694	1.386	1.270	1.270	1.149
58	Wakulla	2.085	1.911	1.911	1.694	1.292	1.270	1.270	1.149
75	Walton	2.085	2.085	2.085	1.820	1.386	1.386	1.270	1.149

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Rate Table: **CC-H** Commercial Policy — Commercial mobile home and commercial mobile home contents (Not Commercial-Residential)

Deductible: 3% of Value (Minimum $1,000)

Note: This is a numeric territory list. Counties may be listed under multiple territory numbers.

Territory		BUILDING Base Rate Per $1,000		CONTENTS Base Rate Per $1,000
Number	**Description**	**Combined Hurricane and Other Wind**		**Combined Hurricane and Other Wind**
59	Bay	8.486		8.486
60	Brevard	9.193		8.486
35	Broward	13.126		12.031
36	Broward	13.126		13.126
37	Broward	13.126		12.031
61	Charlotte	9.258		8.486
62	Collier	9.258		8.486
30	Dade	12.053		12.053
31	Dade	12.053		12.053
32	Dade	13.126		12.031
34	Dade	13.126		12.031
41	Duval	7.941		7.941
43	Escambia	5.683		5.210
63	Escambia	9.258		8.486
64	Flagler	7.941		7.941
78	Flagler	5.210		5.210
65	Franklin	9.258		8.486
66	Gulf	8.486		8.486
56	Hernando	8.486		8.486
76	Indian River	12.053		11.049
67	Lee	9.258		8.486
79	Lee	5.683		5.210
57	Levy	8.486		8.486
68	Manatee	9.258		8.486
85	Monroe	16.468		15.096
86	Monroe	16.468		15.096
69	Nassau	7.941		7.941
70	Okaloosa	9.258		8.486
38	Palm Beach	13.126		12.031
87	Palm Beach	13.126		12.031
88	Pasco	8.486		8.486
42	Pinellas	8.881		8.141
71	Saint Johns	8.323		8.323
77	Saint Lucie	13.126		12.031
72	Santa Rosa	9.258		8.486
80	Santa Rosa	5.683		5.210
73	Sarasota	8.957		8.486
81	Sarasota	5.683		5.210
44	Volusia	5.025		5.025
74	Volusia	7.793		7.793
58	Wakulla	8.486		8.486
75	Walton	9.258		8.486

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XI. PREMIUM DETERMINATION, RATE TABLES AND RATING TERRITORIES

1. Special Class Premium Determination – Wind Only Policies

A. **Special Class** - Real and tangible property which may be unique and unusual, and not specifically rated elsewhere in the manual. The following applies.

1. Only Properties listed may be rated with appropriate Special Class descriptions and upon approval of the Citizens Jacksonville office. Other property types including some with similar characteristics may not be insured.

2. Determine the structure and/or contents classification based on the appropriate Special Class Occupancy description and construction.

3. Determine the S-Number based on the construction (where applicable) and the description of the risk(s).

4. Each rate table contains separate schedules for Hurricane rates and for Other Windstorm or Hail (OWH) rates, which are calculated separately to each peril rate and then combined to a single Hurricane, Other Windstorm or Hail rate. (Exception: Rate Table SC-C contains a single **combined** Hurricane and OWH rate.)

5. Determine the appropriate policy form for the risk(s) and select the appropriate Special Class Rate Table.

   a. Table **SC-C** is for all other structures **and their contents** which will be issued under the wind only Commercial Policy. (The rate table deductible is 3% of insured value with $1000 minimum; 5% deductibles is available.)

   b. Table **SC-D** is for all other structures **and their contents** which are located on a commercial-residential premises and are issued under the wind only Commercial - Residential policy (i.e., apartments, buildings, condominium and townhouse association buildings, etc.). (The rate table deductible is 3% of insured value $1000 minimum; 5% and 10% deductibles are available.)

6. From the appropriate rate table, determine each separate rate (or combined/single rate where applicable) based on territory and S-Number. Multiply or add applicable "Rate Modifiers" to each separate Hurricane and each separate Other Wind or Hail (OWH) rate, or combined/single rate where applicable.

7. Rate Modifiers (Expressed as a component of each separate rate.) - Apply sequentially to each separate Hurricane rate and each separate Other Windstorm or Hail (OWH) rate, as applicable.

   NOTE: Factors may differ between Hurricane and Other Wind or Hail modifiers.

   a. **Selection of "other" Deductible(s) - as applicable, multiply** each separate Hurricane and separate OWH "other" Deductible factor times each separate rate in A.5) above, rounded to three (3) places. Where a **combined** Hurricane and OWH (single rate) rate table is found, **multiply** the single rate by the combined "other" Deductible factor as shown in the Deductible section of the manual. **Deductible factors for Commercial and Commercial-Residential Special Class items are found in the General Rating Section.**

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b. **Coinsurance Factor** - Applicable to Commercial and Commercial-Residential Special Class items (Table **SC-C** and **SC-D** only.) For Commercial, if 90% coinsurance selected, **multiply** each **combined** Hurricane and OWH rate developed above times **.95**. For **100%** coinsurance selected, **multiply** each **combined** Hurricane and OWH rate (single rate) developed above times **.90**, rounded to three (3) places. For Commercial-Residential, if 90% coinsurance selected, multiply each separate Hurricane and separate OWH rate developed above, times .95. If 100% coinsurance selected, multiply each separate Hurricane and separate OWH rate developed above times .90. These coinsurance factors do not apply to Residential policies or properties.

NOTE: Buildings and other insured structures must still be insured to 100% of replacement cost regardless of coinsurance factor selected (unless subject to "First Loss" rules or ACV Loss Settlement Citizens CIT–W0475).

c. **BCEGS - "BCEGS is not available to Special Class Properties except occupancies listed as "Fully Enclosed Appurtenant Structures."** Where applicable, select the appropriate BCEGS factor by Community Grade. Multiply the BCEGS factor to each separate Hurricane and OWH rate developed above, rounded to three (3) places. Where a **combined** Hurricane and OWH rate table is found, **multiply** the BCEGS factor to the single Hurricane and OWH rate developed above, rounded to three (3) places.

8. **Add** the rounded Hurricane **subtotal** rate developed above and the rounded OWH **subtotal** rate developed above **together**. (This equals a combined Hurricane and OWH total rate. (This step is not applicable to a combined rate.)

9. **Multiply** the combined Hurricane and OWH rate (rate per $1,000) times the limit of liability to develop a premium for each risk(s) or item(s) insured.

10. Deductibles apply as appropriate to each wind only policy form. Deductibles apply separately to each structure or group of similar structures (i.e., telephone poles) and upon approval by Citizens. Optional deductibles are available.

11. Limit of liability must reflect 100% of value. Coinsurance and Loss Settlement clauses apply. Do not underinsure the value of the property.

12. If the amount of insurance selected, or if the value exceeds an amount which permits compliance with the coinsurance clause and/or underwriting rules, see "First Loss" Rule.

13. Total all premiums of all risks to be insured on the policy, each structure or building, each structure's contents, etc., to develop the "base" policy premium.

14. Apply the appropriate premium surcharge(s) to the "base" policy premium developed to determine the total policy premium.

2. Descriptions of Eligible Special Class Properties

A. Fully Enclosed Appurtenant Structures (BCEGS Factors are applicable to risks insured under this classification.)

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5. Rate Tables

Rate Table: SC-C
All other structures - commercial policy occupancies.

Deductible: 3% of Value (Minimum $1,000)

Rate Per $1,000

Classification	Territory							
	30-38 77, 87	76	41, 56, 57, 64, 69, 74, 88	42, 59, 60, 62, 70-73, 75	58, 61, 63, 65-68	43, 79, 80, 81	44, 78	85, Monroe Remainder	86, City of Key West Only
COMBINED HURRICANE AND OTHER WINDSTORM OR HAIL									
S-1	0.600	0.600	0.300	0.300	0.300	0.300	0.300	0.840	0.680
S-2	0.900	0.900	0.600	0.600	0.600	0.300	0.300	1.260	1.010
S-3	1.100	1.100	0.800	0.800	0.800	0.600	0.600	1.540	1.240
S-5	1.700	1.700	1.100	1.100	1.100	0.800	0.800	2.380	1.910
S-5A	1.700	1.700	1.100	1.100	1.100	0.900	0.900	2.380	1.910
S-6B	2.610	2.610	1.700	1.700	1.700	1.100	1.100	3.650	2.940
S-9	4.190	4.190	2.760	2.760	2.760	2.000	2.000	5.870	4.710
S-10	5.160	5.160	3.410	3.410	3.410	2.580	2.580	7.220	5.810
S-10B	8.070	8.070	3.630	3.630	3.630	2.730	2.730	11.300	9.080
S-11	8.470	8.470	5.680	5.680	5.680	4.240	4.240	11.860	9.530
S-12	11.070	11.070	7.570	7.570	7.570	5.680	5.680	15.500	12.450
S-13	14.720	14.720	9.840	9.840	9.840	7.320	7.320	20.610	16.560
S-16A	29.460	29.460	19.600	19.600	19.600	14.720	14.720	41.240	33.140
S-17	37.620	37.620	25.140	25.140	25.140	20.920	20.920	52.670	42.320
S-17A	39.200	39.200	16.220	16.220	16.220	12.280	12.280	54.880	44.100
S-18A	44.180	44.180	29.460	29.460	29.460	22.040	22.040	61.850	49.700
S-22	117.820	117.820	78.600	78.600	78.600	58.900	58.900	164.950	132.550

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1. If applicable, use the “all other” BCEGS grades.
2. BCEGS Factors apply <u>only</u> to the Special Class “Other Structures” occupancy listing.

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Rate Table: SC-D
All other structures - Commercial-Residential policy occupancies.

Deductible: 3% of Value (Minimum $1000) Rate Per $1,000

Classification	Territory								
	30-38, 77, 87	76	41, 56, 57, 64, 69, 74, 88	42, 59, 60, 62, 70-73, 75	58, 61, 63, 65-68	43, 79 80, 81	44, 78	85, Monroe Remainder	86, City of KEY WEST ONLY
HURRICANE									
S-1	0.570	0.570	0.285	0.285	0.285	0.285	0.285	0.798	0.646
S-2	0.855	0.855	0.570	0.570	0.570	0.285	0.285	1.197	0.960
S-3	1.045	1.045	0.760	0.760	0.760	0.570	0.570	1.463	1.178
S-5	1.615	1.615	1.045	1.045	1.045	0.760	0.760	2.261	1.815
S-5A	1.615	1.615	1.045	1.045	1.045	0.855	0.855	2.261	1.815
S-6B	2.480	2.480	1.615	1.615	1.615	1.045	1.045	3.468	2.793
S-9	3.981	3.981	2.622	2.622	2.622	1.900	1.900	5.577	4.475
S-10	4.902	4.902	3.240	3.240	3.240	2.451	2.451	6.859	5.520
S-10B	7.667	7.667	3.449	3.449	3.449	2.594	2.594	10.735	8.626
S-11	8.047	8.047	5.396	5.396	5.396	4.028	4.028	11.267	9.054
S-12	10.517	10.517	7.192	7.192	7.192	5.396	5.396	14.725	11.828
S-13	13.984	13.984	9.348	9.348	9.348	6.954	6.954	19.580	15.732
S-16A	27.987	27.987	18.620	18.620	18.620	13.984	13.984	39.178	31.483
S-17	35.739	35.739	23.883	23.883	23.883	19.874	19.874	50.037	40.204
S-17A	37.240	37.240	15.409	15.409	15.409	11.666	11.666	52.136	41.895
S-18A	41.971	41.971	27.987	27.987	27.987	20.938	20.938	58.758	47.215
S-22	111.929	111.929	74.670	74.670	74.670	55.955	55.955	156.703	125.923
Other Wind									
S-1	0.030	0.030	0.015	0.015	0.015	0.015	0.015	0.042	0.034
S-2	0.045	0.045	0.030	0.030	0.030	0.015	0.015	0.063	0.051
S-3	0.055	0.055	0.040	0.040	0.040	0.030	0.030	0.077	0.062
S-5	0.085	0.085	0.055	0.055	0.055	0.040	0.040	0.119	0.096
S-5A	0.085	0.085	0.055	0.055	0.055	0.045	0.045	0.119	0.096
S-6B	0.131	0.131	0.085	0.085	0.085	0.055	0.055	0.183	0.147
S-9	0.210	0.210	0.138	0.138	0.138	0.100	0.100	0.294	0.236
S-10	0.258	0.258	0.171	0.171	0.171	0.129	0.129	0.361	0.291
S-10B	0.404	0.404	0.182	0.182	0.182	0.137	0.137	0.565	0.454
S-11	0.424	0.424	0.284	0.284	0.284	0.212	0.212	0.593	0.477
S-12	0.554	0.554	0.379	0.379	0.379	0.284	0.284	0.775	0.623
S-13	0.736	0.736	0.492	0.492	0.492	0.366	0.366	1.031	0.828
S-16A	1.473	1.473	0.980	0.980	0.980	0.736	0.736	2.062	1.657
S-17	1.881	1.881	1.257	1.257	1.257	1.046	1.046	2.634	2.116
S-17A	1.960	1.960	0.811	0.811	0.811	0.614	0.614	2.744	2.205
S-18A	2.209	2.209	1.473	1.473	1.473	1.102	1.102	3.093	2.485
S-22	5.891	5.891	3.930	3.930	3.930	2.945	2.945	8.248	6.628

1. If applicable and based on the occupancy, the BCEGS grade may either be the “1 and 2 family” or the “all other” grade.

2. BCEGS Factors apply only to the Special Class “Other Structures” occupancy listing.

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Deleted: BCEGS Factor
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Deleted: Total (Round to 3 decimals)
Deleted: Building Hurricane Total + Other Wind Total
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D. **Limit of Insurance**

1. Completed Value Builders' Risk Changes Form – *CIT-W 11 20* - The limit of insurance should contemplate the full value of the described property at the date of completion, including all permanent fixtures and decorations that constitute a part of the building. Must also comply with construction "starts". Failure to maintain the proper limit of insurance may cause the insured to incur a coinsurance penalty.

2. Builders' Risk Change Form – *CIT-W 11 19* - The limit of insurance will not contemplate the full value of the described property at the date of completion, including all permanent fixtures and decorations that constitute a part of the building and does not comply with construction "starts". Citizens will insure only to other wind only applicable maximum limit. The full value as described should be indicated in the underwriting section of the application to determine the appropriate coinsurance percentage or waiver of coinsurance. Failure to indicate the proper limit of insurance and the full value of the risk(s) as described may cause the insured to incur a coinsurance penalty.

   Subject to approval of Citizens, if the limit of insurance is increased during the term of the policy, compute the premium for the increased limit from the inception date of the policy to expiration.

   NOTE: Contract price does not necessarily equal the full value at completion.

3. Coverage Limits are based on the occupancy when completed. See Maximum Coverage Available section. Residential and Commercial-Residential Properties coverage amount subject to the maximum limit rules, may exceed the standard maximum limits so that insuring to 100% at completed value is complied with.

   The Completed Value Endorsement (CIT-W11 20) may not be used on commercial non-residential policies where the insurable value exceeds the program's maximum limit.

E. **Policy Inception Date and Policy Term**

1. Policy Inception Date - Select an inception date which is not later than:
   a. the date construction starts above the level of the lowest basement floor; or
   b. the date construction starts, if there is no basement.

2. Effective Date rules apply. If the effective date of the policy does not comply with Rule **E.1** above, use Table **BR-B**.
   a. You may not use the "Completed Value" - Table **BR-A**.
   b. You may not apply a 100% coinsurance credit to the rates in Table **BR-B**.

3. Policy Term - Issue policies for a one (1) year term.

4. One building per policy. More than 1 building per policy may be issued if located on the same premises, with approval of Citizens.

5. Upon completion of construction or issuance of a certificate of occupancy, the policy must be canceled. (Coverage for the completed structure must be submitted on a new application).

6. **Deductible** - Commercial Policy deductible is applicable. The percentage (%) of value for the purpose of calculating the deductible amount is the completed value of the risk, regardless of the actual construction period.

7. Actual Cash Value Loss Settlement Option not available.

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8. Wind Storm Protection Devices Credit not available.

3. Premium Determination – Wind Only Policies

A. Determine Rate Table corresponding to the Builders' Risk form applicable.

B. Builders' Risk Changes - Commercial Form – *CIT-W 11 20* - Completed Value - use Table **BR-A**. (Make no modification for coinsurance).

C. Builders' Risk Changes - Commercial Form – *CIT-W 11 19* - 80% Coinsurance Rates - use Table **BR-B.**

D. From the appropriate rate table, determine the rate, based on occupancy class, territory and construction. Multiply the applicable "Rate Modifiers" to each combined (single rate) Hurricane, and Other Windstorm or Hail (OWH) rate.

Deleted: The applicable Rate Modifier(s) are designated at the bottom of each rate table.

1. **Rate Modifiers** - (each is expressed as a component of each combined Hurricane and OWH rate) - apply sequentially.

2. **Optional Deductible Factor - multiply** each **combined** Hurricane and OWH Optional Deductible factor times each rate, rounded to three (3) places.

3. **Coinsurance Factor - 90%** Coinsurance - if value of property exceeds an amount which complies with 100% of completed value, **90%** coinsurance may be selected: Use Builders' Risk Rate Table **BR-B** - apply the coinsurance credit by multiplying the rate by **.95**, rounded to three (3) places. (90% coinsurance credit is 5%.)

4. **BCEGS** - The BCEGS factor is not applicable to builders' risk issued on the commercial policy.

E. When mixed occupancies are in the same "building", determine from the "Occupancy List", the appropriate rate table for each occupancy. Disregard any occupancy which represents 25% or less of the total floor area of the building. Select the rate table which has the highest rate, based on territory and construction.

F. **Multiply** the combined Hurricane and OWH rate (rate per $1,000) times the limit of liability to develop a premium for each risk insured.

G. **First Loss Rule Table** - If the amount of insurance selected or if the completed value of property exceeds an amount which permits compliance with the 80% or 90% coinsurance clause, and 80% or 90% coinsurance is not accepted, the "First Loss" Rule may be used.

H. Total the premium(s) of the risk(s) to be insured on the policy (the "base" premium).

I. Apply the appropriate surcharge(s) (e.g. Catastrophe Reinsurance Surcharge of 15% and Tax-Exempt Surcharge of 1.75%) to the "base" policy premium developed to determine the total policy premium.

J. Wind Protective Device(s) credits do not apply.

7. Rate Tables

Rate Table: BR-A
Builders' Risk - Completed Value

Deductible: 3% of Value (Minimum $1,000)

Combined Hurricane and Other Wind Rate per $1,000

	Territory								
Occupancy	30-38, 77, 87	76	41, 56, 57, 64, 69, 74, 88	42, 59, 60, 62, 70-73, 75	58, 61, 63, 65-68	43, 79, 80, 81	44, 78	85, Monroe Remainder	86, city of KEY WEST ONLY
1. **Dwellings, Commercial-Residential Occupancy (one story in height)** • Boarding Houses • Modular Structures • Fraternity and Sorority Houses • Hotel/Motels (one story in height or not exceeding 4 bedrooms for guests in a single building. • Nurses and Sisters' home									
A) Wind Resistive	1.600	1.600	1.090	1.090	1.090	0.800	0.800	2.220	1.890
B) Semi-Wind Resistive	2.070	2.070	1.370	1.370	1.370	0.990	0.990	2.780	2.360
C) Masonry	2.550	2.550	1.690	1.690	1.690	1.280	1.280	3.350	2.860
D) Frame	2.550	2.550	1.690	1.690	1.690	1.280	1.280	3.350	2.860
2. **Commercial-Residential Occupancy (Two or more stories in height)** • Bath and Commercial Clubs, Hotels and Motels (Two or more stories in height and exceeding 4 bedrooms for guests in a single building)									
A) Wind Resistive	3.730	3.730	1.090	1.090	1.090	0.800	0.800	3.920	1.980
B) Semi-Wind Resistive	4.150	4.150	1.370	1.370	1.370	0.990	0.990	5.810	2.930
C) Masonry	5.180	5.180	1.690	1.690	1.690	1.280	1.280	7.140	4.010
D) Frame	6.380	6.380	2.810	2.810	2.810	2.100	2.100	8.920	5.400
3. **All Other Commercial Risks not carrying completed building Special Class rates**									
A) Wind Resistive	1.800	1.800	1.090	1.090	1.090	0.800	0.800	2.600	2.100
B) Semi-Wind Resistive	2.500	2.500	1.370	1.370	1.370	0.990	0.990	3.550	3.050
C) Masonry	4.190	4.190	1.690	1.690	1.690	1.280	1.280	5.690	4.100
D) Frame	5.710	5.710	2.810	2.810	2.810	2.100	2.100	7.690	5.500
4. **Risks carrying completed building Special Class rates-multiply Special Class rates as shown:**									
Limit such rates to the following:	0.743	0.743	0.743	0.743	0.743	0.743	0.743	1.040	0.891
A) Wind Resistive	None	None	None	None	None	None	None	8.900	4.450
B) Semi-Wind Resistive	None	None	None	None	None	None	None	13.350	6.670
C) Masonry	None	None	None	None	None	None	None	15.530	8.640
D) Frame	None	None	None	None	None	None	None	19.390	11.590

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Deleted: Base Rate
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Deleted: Total (Round to 3 decimals)

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Rate Table: BR-B
Builders' Risk - 80% Coinsurance Rates

Deductible: 3% of Value (Minimum $1,000)

Combined Hurricane and Other Wind Rate per $1,000

	Territory								
Occupancy	30-38, 77, 87	76	41, 56, 57, 64, 69, 74, 88	42, 59, 60, 62, 70-73, 75	58, 61, 63, 65-68	43, 79, 80, 81	44, 78	85, Monroe Remainder	86, city of KEY WEST ONLY
1. **Dwellings, Commercial-Residential Occupancy (one story in height)** • Boarding Houses • Modular Structures • Fraternity and Sorority Houses • Hotel/Motels (one story in height or not exceeding 4 bedrooms for guests in a single building. • Nurses and Sisters' home									
A) Wind Resistive	3.240	3.240	2.200	2.200	2.200	1.620	1.620	4.480	3.820
B) Semi-Wind Resistive	4.190	4.190	2.760	2.760	2.760	2.000	2.000	5.620	4.770
C) Masonry	5.160	5.160	3.410	3.410	3.410	2.580	2.580	6.770	5.770
D) Frame	5.160	5.160	3.410	3.410	3.410	2.580	2.580	6.770	5.770
2. **Commercial-Residential Occupancy (Two or more stories in height)** - Bath and Commercial Clubs, Hotels and Motels (Two or more stories in height and exceeding 4 bedrooms for guests in a single building)									
A) Wind Resistive	7.540	7.540	2.200	2.200	2.200	1.620	1.620	7.910	4.000
B) Semi-Wind Resistive	8.390	8.390	2.760	2.760	2.760	2.000	2.000	11.730	5.910
C) Masonry	10.460	10.460	3.410	3.410	3.410	2.580	2.580	14.430	8.110
D) Frame	12.890	12.890	5.680	5.680	5.680	4.240	4.240	18.030	10.910
3. **All Other Commercial Risks not carrying completed building Special Class rates**									
A) Wind Resistive	3.630	3.630	2.200	2.200	2.200	1.620	1.620	5.250	4.250
B) Semi-Wind Resistive	5.060	5.060	2.760	2.760	2.760	2.000	2.000	7.180	6.170
C) Masonry	8.470	8.470	3.410	3.410	3.410	2.580	2.580	11.490	8.280
D) Frame	11.530	11.530	5.680	5.680	5.680	4.240	4.240	15.530	11.120
4. **Risks carrying completed building Special Class rates-multiply Special Class rates as shown:**									
	1.500	1.500	1.500	1.500	1.500	1.500	1.500	2.100	1.800
Limit such rates to the following:									
A) Wind Resistive	None	None	None	None	None	None	None	8.900	4.450
B) Semi-Wind Resistive	None	None	None	None	None	None	None	13.350	6.670
C) Masonry	None	None	None	None	None	None	None	15.530	8.640
D) Frame	None	None	None	None	None	None	None	19.390	11.590

Deleted: Hurricane & Other Wind

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Deleted: Coinsurance (90% only)

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Deleted: Total (Round to 3 decimals)

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CERTIFICATE OF TRUE AND ACCURATE RATE FILING

I, Sharon Binnun, CFO
(Print or type name) (Print or type title)

Section 627.062(9) requires that this form must be signed by either the Chief Executive Officer or Chief Financial Officer, as well as the Chief Actuary.

and

Brian Donovan Chief Actuary*,
(Print or type name)

pursuant to Section 627.062(9), Florida Statutes, under oath, do swear and attest, based upon the signing officer's and actuary's knowledge, under penalty of perjury, that:

1. We have reviewed the foregoing rate filing;
2. The rate filing does not contain any untrue statement of a material fact, or omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which such statements were made, not misleading;
3. The information contained in the rate filing relating to the factors described in s. 627.062(2)(b), F.S., including, but not limited to, investment income, fairly represents in all material respects the basis of the rate filing for the periods presented in the filing; and
4. The filing reflects all premium savings that are reasonably expected to result from legislative enactments and are in accordance with generally accepted and reasonable actuarial techniques.

______________________ or Sharon Binnun
(Signature) Chief Executive Officer (Signature) Chief Financial Officer

______________________ 9/11/09
(Print Name) (Print Name)

Brian Donovan
(Signature) Chief Actuary

Brian Donovan
(Print Name)

* Chief Actuary means an actuary, as defined in Section 627.0645(8), Florida Statutes, that is either employed by the insurer as the Chief Actuary or, if the insurer does not employ a Chief Actuary, is the primary consulting actuary involved in the preparation and review of this rate filing.

OIR-B1-1790 (03/2007) Rule 69O-170.0155

Notarization of Officer (CEO or CFO):

STATE OF FLORIDA
COUNTY OF LEON

Sworn to (or affirmed) and subscribed before me this 11 day of SEPTEMBER, 2009, by

SHARON BINNUN.

Personally Known ✓ OR Produced Identification ______________
Type of Identification Produced ______________

Notary Signature [signature]

My commission expires: SEPTEMBER 21, 2012

SARA J. GOLDING
Notary Public - State of Florida
My Comm. Expires Sep 21, 2012
Commission # DD 824805

Notarization of Chief Actuary

STATE OF ______________
COUNTY OF ______________

Sworn to (or affirmed) and subscribed before me this _____ day of _____, 20__, by

______________.

Personally Known ________ OR Produced Identification ______________
Type of Identification Produced ______________

Notary Signature Deborah Exelby Kelly

My commission expires: 7/27/2010

DEBORAH EXELBY KELLY
Notary Public, State of Florida
My comm. exp. Jul. 27, 2010
Comm. No. DD 578833

Citizens Property Insurance Corporation
Commercial Non Residential Wind

2010 Commercial Wind Manual Changes

Summary of Changes

Rule Title	Page Number & Proposed Rule	Page Number & Prior Rule	Comment
Entire Manual			
Edition Dates			The edition dates on amended pages will reflect an edition date of 01/2010.
Section II			
Coverage Limits	N/A	Page 1 Rule 2.A.	The reference to the Market Availability Document is removed as we no longer use this form. This change is being filed under the companion Commercial Residential filing and is only included because the page contains both Commercial Residential and Commercial Non-Residential changes.
Coverage Limits	Page 1 Rule 2.A.	Page 1 Rule 2.A.	The rule has been amended to reflect that individual risk submissions are required when a building's replacement cost value exceeds $10,000,000. This change is being filed under the companion Commercial Residential filing and is only included because the page contains both Commercial Residential and Commercial Non-Residential changes.
Coverage Limits	Page 1 Rule 2.B.	Page 1 Rule 2.B.	This rule is amended to clarify that the $1,000,000 limit applies per insured per location.
Coverage Limits	Page 2	Page 2	No change has been made to the rules on this page. The edition date has been changed due to a new page break.
Section III			
Policy Changes	Page 3 Rule 7.D.	N/A	We have added a provision to clarify a policy may not be canceled and rewritten to circumvent rate, rule, coverage or surcharge changes.
Cancellations and Nonrenewals	Page 4 Rule 8.C.1.c.	Page 4 Rule 8.C.1.c.	Reference to the Market Equalization Surcharge is removed from the note as this surcharge is not currently being assessed.
Section VI			
Commissions	Page 1 Rule 2	Page 1 Rule 2	The Florida Hurricane Catastrophe Fund Build-Up premium is added as non-commissionable.
Section VII			
Commercial Residential Windstorm Mitigation Definitions	Page 6 Rule 3.A.2.	Page 6 Rule 3.A.2.	Amended rule to update statute reference.

Section VIII			
Policy Minimum Premiums – Wind Only Policies	Page 1 Rule 4.B.	Page 1 Rule 4.B.	Added new provision to the minimum premium rule for Commercial Residential policies. The provision provides that the minimum premium is applied before the FHCF Build-Up Premium is added to the Total Item Premium. This change is being filed under the companion Commercial Residential filing and is only included because the page contains both Commercial Residential and Commercial Non-Residential information.
Individual Risk Submission	Page 6 Rule 7.A.1.	Page 6 Rule 7.A.1.	The rule has been amended to reflect that individual risk submissions are required when a building's replacement cost value exceeds $10,000,000. This change is being filed under the companion Commercial Residential filing and is only included because the page contains both Commercial Residential and Commercial Non-Residential information.
Section X			
Rate Tables	Pages 3-7	Pages 3-7	The rate tables have been updated to add new rates. In addition, the calculation tables at the bottom of the base rate tables have been removed.
Rate Tables	Page 5 Table CC-F	Page 5 Table CC-F	The word "hurricane" is corrected in the contents base rate table header.
Section XI			
Special Class Premium Determination	Removed	Pages 1 Rule 1.A.7	Deleted rule which states "The applicable Rate Modifier(s) are designated at the bottom of each rate table" as the rate modifiers are provided in the premium determination steps. Subsequent rule provisions have been renumbered to accommodate this change.
Rate Tables	Pages 6-7	Pages 6-7	The calculation tables at the bottom of the base rate tables have been removed as this information is provided in the premium determination steps.
Rate Tables	Page 7	Page 7	Corrected typo in the deductible in the header of the SC-D table. Amended "2% of Value (Minimum $500)" to "3% of Value (Minimum $1000)". This is not a change in our deductible offering; this is just a typo correction.
Section XII			
Builders Risk Coverage – Wind Only Commercial Policy	Page 2 Rule 2.D.3.	Page 2 Rule 2.D.3.	The rule is clarified to indicate that the Completed Value Endorsement may not be used on a commercial non-residential policy where the insurable value exceeds the program's maximum limit.
Premium Determination – Wind Only Policies	Page 3 Rule 3.D.	Page 3 Rule 3.D.	Deleted section of rule which states "The applicable Rate Modifier(s) are designated at the bottom of each rate table" as the rate modifiers are provided within the premium determination steps.
Rate Tables	Pages 6-7	Pages 6-7	The calculation tables at the bottom of the base rate tables have been removed as this information is provided in the premium determination steps.

Filing Details

Work Unit Number:	W09-544051
Filing Purpose:	Rate & Rule
Product:	Property / Commercial Non-Residential
Date Created:	9/2/2009 04:51:20 PM
Filing Name:	CNR-W 2010 Rate Filing LOB 010

Company Details

Company Name	FEIN	NAIC CC	NAIC GC
CITIZENS PROPERTY INSURANCE CORPORATION	593164851	10064	

Filing Originator Information

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City:	Tallahassee
State:	FL
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State:	FL
Zip Code:	32303
Country:	USA
Non US Postal Code:	
Phone Number:	850-521-8136 **Ext**
Fax Number:	850-575-1879
Toll Free Number:	**Ext**
Non US Phone Number:	

General Information

Company Filing Number	
New Business Effective Date	1 / 1 / 2010
Renewal Business Effective Date	1 / 1 / 2010
Product:	Property / Commercial Non-Residential
Are you writing new business in Florida for this line of business?	Yes

Filing Content Information

This is a Rate & Rule filing.

Type of Coverage:

Commercial

File Usage:

FILE & USE

Rate/Rule Filings

Is this filing being submitted by a Ratings Organization?	Yes No
Is this filing being made to comply with the annual rate filing requirements found in Section 627.0645, Florida Statutes?	Yes No
If yes, are you filing the annual rate certification form OIR-B1-586 or exemption form OIR-B1-584?	Yes No N/A
Have you included a listing of all changes in manual pages or rules with supporting information and explanation?	Yes No
Does this filing result in a significant revision in rates or rating variables? If Yes, explain in filing:	Yes No
Does this filing result in a significant revision in underwriting rules or guidelines? If Yes, explain in filing:	Yes No
Does this filing amend any of the following?	Yes No

(Please mark the appropriate item, if applicable)

- Base Rate(s) & Loss Costs
- Base Rate(s) Only
- Loss Costs Only

Summary of Rate Filing as applicable

Rate Change Request	9.9
Rate Indicated	123.6
Earned Premium Volume (all programs affected by this filing)	59294
Number of Policies (all programs affected by this filing)	30888

Uploaded Documents

Document Type	Filenet Number	Form Number	Title
Miscellaneous	0		HRA CN_R RCS Verificat BLDG BG II_9_29_09
Miscellaneous	0		HRA CN_R RCS Verificat CNTS BG II_9_29_09
Miscellaneous	0		Agent Commission Schedule
Miscellaneous	0		CNR Results_RMS Version 6.0b
Forms	0		CNR_W OIR-B1-595
Miscellaneous	0		DetailedDataFieldDescript ion
Miscellaneous	0		RMS Standard G-2.2
Miscellaneous	0		RMS07Standards_S-5 Replication of Known Hurricane Losses
Miscellaneous	0		RMS07Standards_S-2 Sensitivity Analysis for Model Output
Miscellaneous	0		FLOIR Comm Res and NonRes_RMS60b_PartA_Final
Miscellaneous	0		FLOIR Comm Res and NonRes_RMS60b_PartB
Miscellaneous	0		Additional Rules Information
Miscellaneous	0		Printers Proof
Miscellaneous	0		Strike & Delete
Miscellaneous	0		True and Accurate Form 9_11_09
Miscellaneous	0		HRA CNR(CC-D)
Miscellaneous	0		Source of Information for RIF CNRW
Miscellaneous	0		CNRW-Statewide Rate Indication
Miscellaneous	0		CNRW-Territory Indication
Cover Letter	0		1 Cover letter
Explanatory Memorandum	0		CNRW Actuarial Memo_v1

Filing Certification

I certify that I am authorized to make this Forms or Rate/Rule filing on behalf of the company(s) referenced herein. I further certify that the information contained in related transmittals and the filing is true, complete, correct and, to the best of my knowledge, in compliance with all applicable Florida laws and administrative rules including applicable policy readability standards.

Name: Oscar Baltodano

Title: Actuarial Analyst

Filing Details

Work Unit Number:	W09-544051
Filing Purpose:	Rate & Rule
Product:	Property / Commercial Non-Residential
Date Created:	9/2/2009 04:51:20 PM
Filing Name:	CNR-W 2010 Rate Filing LOB 010

Interrogatories

1. Are you someone other than an employee of the company who is making this filing on behalf of the company? — Yes No

2. Is this filing being made to comply with a change in Florida law? — Yes No

3. Does this filing propose changes in the level of coverage you are providing to your insureds? — Yes No

4. Does this filing include the use of a Catastrophe Model in the determination of any rate level indication? — Yes No
   Components Added:
   - Commercial Catastrophe Model Support (Required)

5. Does this filing include reinsurance costs in the determination of any rate level indication? — Yes No

6. Does this filing include rates or rating factors that result in a rate change to the Office's RCS rating examples OR is there an overall rate change associated with this filing OR does this filing include the introduction of a new program? — Yes No
   Components Added:
   - Rate Collection System (Required)
   - RCS Verification (Required)

7. (a) Does this filing involve the adoption of loss costs promulgated by a Rating Organization where the loss cost modification factor equals 1? — Yes No

   (b) Does this filing involve the adoption of loss costs promulgated by a Rating Organization where the loss cost modification factor is not equal to 1 AND the modification factor IS based on the filer's loss experience? — Yes No

   (c) Does this filing involve the adoption of loss costs promulgated by a Rating Organization where the loss cost modification factor is not equal to 1 AND the modification factor IS NOT based on the filer's loss experience? — Yes No

   (d) Is this an independent rate or rating factor filing where the proposed rate change affects all (or substantially all) policyholders? — Yes No
   Components Added:
   - DI4-595 (Florida Expense Supplement for Independent Rate Filings) (Required)
   - Rate Level Indications Workbook - Commercial (Required)

   (e) Is this an independent rate or rating factor filing where the proposed rate change DOES NOT affect all (or substantially all) policyholders? — Yes No

Default Commercial Property Group 1 Territory Set

Territory Code	Territory Description	Region
001	Jacksonville	Jacksonville
002	Miami	Miami
003	Tampa	Tampa
004	Miami-Beach	Miami-Beach
005	Miami-Dade Ex Hialeah, Miami Beach, Miami	Miami-Dade Ex Hialeah, Miami Beach, Miami
006	Hillsborough County Ex Tampa	Hillsborough Ex Tampa
007	Hialeah	Hialeah
008	St. Petersburg	St. Petersburg
009	Balance of State (Florida)	Balance of Florida

Default Commercial Property Group 2 Territory Set

Territory Code	Territory Description	Region
001	Inland	Inland
002	Seacoast - Zone 1	Seacoast - Zone 1
003	Seacoast - Zone 2	Seacoast - Zone 2
004	Seacoast - Zone 3	Seacoast - Zone 3
005	Seacoast - Monroe County - Key West	Seacoast - Monroe County - Key West
006	Seacoast - Monroe County - Remainder of County	Seacoast - Monroe County - Remainder of the County

Program	Premium Breakdown Type	Policy/Coverage	Commissions and Brokerage (%)
HRA CNR (CC-E)	N/A	GROUP 1	14.00%
		GROUP 2	14.00%

Other Acquisition Expenses (%)	General Expenses (%)	Premium Taxes (%)	Misc. Licenses and Fees (%)	Reinsurance Costs (%)	Profit and Contingency (%)	Loss and Loss Adjustment Expenses (%)
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%

Other Description	Other(%)	Total (=100%)			
Residual Market Contingency Provision	10.00%	100.00%			
Residual Market Contingency Provision	10.00%	100.00%			

Program	Premium Breakdown Type	Policy/Coverage	Commissions and Brokerage (%)
HRA CNR (CC-D)	N/A	GROUP 1	14.00%
		GROUP 2	14.00%

Other Acquisition Expenses (%)	General Expenses (%)	Premium Taxes (%)	Misc. Licenses and Fees (%)	Reinsurance Costs (%)	Profit and Contingency (%)	Loss and Loss Adjustment Expenses (%)
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%

Other Description	Other(%)	Total (=100%)			
Residual Market Contingency Provision	10.00%	100.00%			
Residual Market Contingency Provision	10.00%	100.00%			

Program	Premium Breakdown Type	Policy/Coverage	Commissions and Brokerage (%)
HRA CNR (CC-F)	N/A	GROUP 1	14.00%
		GROUP 2	14.00%

Other Acquisition Expenses (%)	General Expenses (%)	Premium Taxes (%)	Misc. Licenses and Fees (%)	Reinsurance Costs (%)	Profit and Contingency (%)	Loss and Loss Adjustment Expenses (%)
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%

Other Description	Other(%)	Total (=100%)			
Residual Market Contingency Provision	10.00%	100.00%			
Residual Market Contingency Provision	10.00%	100.00%			

Program	Premium Breakdown Type	Policy/Coverage	Commissions and Brokerage (%)
HRA CNR (CC-G)	N/A	GROUP 1	14.00%
		GROUP 2	14.00%

Other Acquisition Expenses (%)	General Expenses (%)	Premium Taxes (%)	Misc. Licenses and Fees (%)	Reinsurance Costs (%)	Profit and Contingency (%)	Loss and Loss Adjustment Expenses (%)
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%

Other Description	Other(%)	Total (=100%)			
Residual Market Contingency Provision	10.00%	100.00%			
Residual Market Contingency Provision	10.00%	100.00%			

Program	Premium Breakdown Type	Policy/Coverage	Commissions and Brokerage (%)
HRA CNR (CC-H)	N/A	GROUP 1	14.00%
		GROUP 2	14.00%

Other Acquisition Expenses (%)	General Expenses (%)	Premium Taxes (%)	Misc. Licenses and Fees (%)	Reinsurance Costs (%)	Profit and Contingency (%)	Loss and Loss Adjustment Expenses (%)
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%
0.40%	5.30%	1.75%	0.36%	0.00%	0.00%	68.19%

Other Description	Other(%)	Total (=100%)			
Residual Market Contingency Provision	10.00%	100.00%			
Residual Market Contingency Provision	10.00%	100.00%			

Program	Policy	Do you offer this?
HRA CNR (CC-E)	GROUP 2	Yes

Rating Example Description	Identical Risk (Yes or No)
Group 2 Perils: Windstorms or Hail, Smoke, Aircraft or Vehicles, Riot or Civil Commotion, Sinkhole Collapse or Action (Construction)	No

Risk Difference	Risk Type	Specialty/ Class Code
Wind or hail, debris removal, and pollutant clean up coverages only	Building	Symbol A
		Symbol AA
		Symbol AB
		Symbol B
	Contents	Symbol A
		Symbol AA
		Symbol AB
		Symbol B

Exposure Base	Data	001	002	003
v - Insured Value	Rate	0.0000	0.5602	0.1370
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.5602	0.1370
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.6162	0.2045
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.6869	0.3549
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.5420	0.1336
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.5420	0.1336
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.5892	0.1986
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.6419	0.3546
	U/W	No	Yes	Yes

004	005	006
0.1016	0.4395	0.6340
Yes	Yes	Yes
0.1016	0.4395	0.6340
Yes	Yes	Yes
0.1311	0.5280	0.8191
Yes	Yes	Yes
0.2516	0.7502	0.9302
Yes	Yes	Yes
0.0931	0.4029	0.6340
Yes	Yes	Yes
0.0931	0.4029	0.6340
Yes	Yes	Yes
0.1288	0.4840	0.8191
Yes	Yes	Yes
0.2474	0.7385	0.8973
Yes	Yes	Yes

Program	Policy	Territory Set
HRA CNR (CC-E)	GROUP 1	Default Commercial Property Group 1 Territory Set

Specialty/ Class Code	Data	001
FL7.0511	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	$0.00
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00

007	008	009
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00

Program	Policy	Territory Set
HRA CNR (CC-E)	GROUP 2	Default Commercial Property Group 2 Territory Set

Specialty/ Class Code	Data	001
Symbol A	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AA	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AB	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol B	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$101,114.00	$124,710.00	$4,000.00	$17,160.00	$13,838.00
141	145	4	21	16
$1,151,580.00	$415,626.00	$13,677.00	$106,596.00	$86,904.00
$8,167.00	$2,866.00	$3,419.00	$5,076.00	$5,432.00
$8,984.00	$3,152.00	$3,761.00	$5,584.00	$5,975.00
$101,114.00	$124,710.00	$4,000.00	$17,160.00	$13,838.00
141	145	4	21	16
$1,151,580.00	$415,626.00	$13,677.00	$106,596.00	$86,904.00
$8,167.00	$2,866.00	$3,419.00	$5,076.00	$5,432.00
$8,984.00	$3,152.00	$3,761.00	$5,584.00	$5,975.00
$41,642.00	$65,562.00	$10,931.00	$3,000.00	$6,680.00
55	87	14	3	10
$320,365.00	$206,225.00	$24,670.00	$65,727.00	$58,155.00
$5,825.00	$2,370.00	$1,762.00	$21,909.00	$5,816.00
$6,407.00	$2,601.00	$1,907.00	$24,100.00	$6,397.00
$114,826.00	$116,852.00	$11,568.00	$45,851.00	$26,208.00
168	195	24	63	37
$823,814.00	$456,848.00	$34,284.00	$315,881.00	$264,675.00
$4,904.00	$2,343.00	$1,428.00	$5,054.00	$7,153.00
$5,394.00	$2,571.00	$1,553.00	$5,559.00	$7,869.00

Statewide Rate Level Effect

Policy	Specialty/Class Code	Total Amount of Insurance (in 000s) ($)	Number of Policies	Earned Premium ($)	Current % Change (%)
GROUP 1	FL7.0511	$0.00	0.00	$0.00	0
GROUP 2	Symbol AB	$127,815.00	169.00	$675,142.00	9.8
	Symbol B	$315,305.00	487.00	$1,895,502.00	9.9
	Symbol AA	$260,822.00	327.00	$1,774,383.00	10
	Symbol A	$260,822.00	327.00	$1,774,383.00	10
	Total:	$964,764.00	1,310.00	$6,119,410.00	10.0

Program	Policy	Do you offer this?
HRA CNR (CC-D)	GROUP 2	Yes

Rating Example Description	Identical Risk (Yes or No)
Group 2 Perils: Windstorms or Hail, Smoke, Aircraft or Vehicles, Riot or Civil Commotion, Sinkhole Collapse or Action (Construction)	No

Risk Difference	Risk Type	Specialty/ Class Code
Wind or hail, debris removal, and pollutant clean up coverages only	Building	Symbol A
		Symbol AA
		Symbol AB
		Symbol B
	Contents	Symbol A
		Symbol AA
		Symbol AB
		Symbol B

Exposure Base	Data	001	002	003
v - Insured Value	Rate	0.0000	0.2138	0.1386
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.2138	0.1386
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.3154	0.2030
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.5353	0.3364
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.2138	0.1366
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.2138	0.1366
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.2924	0.1960
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.5121	0.3325
	U/W	No	Yes	Yes

004	005	006
0.0982	0.2508	0.2904
Yes	Yes	Yes
0.0982	0.2508	0.2904
Yes	Yes	Yes
0.1386	0.3775	0.4395
Yes	Yes	Yes
0.2273	0.6428	0.7497
Yes	Yes	Yes
0.0940	0.2508	0.2904
Yes	Yes	Yes
0.0940	0.2508	0.2904
Yes	Yes	Yes
0.1270	0.3775	0.4395
Yes	Yes	Yes
0.2138	0.6428	0.7162
Yes	Yes	Yes

Program	Policy	Territory Set
HRA CNR (CC-D)	GROUP 1	Default Commercial Property Group 1 Territory Set

Specialty/ Class Code	Data	001
FL7.0511	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	$0.00
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00

007	008	009
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00

Program	Policy	Territory Set
HRA CNR (CC-D)	GROUP 2	Default Commercial Property Group 2 Territory Set

Specialty/ Class Code	Data	001
Symbol A	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	$0.00
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AA	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	$0.00
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AB	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	$0.00
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol B	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	$0.00
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$3,536.00	$1,648.00	$0.00	$22,098.00	$8,738.00
10	4	0	23	26
$6,736.00	$1,973.00	$0.00	$37,606.00	$22,496.00
$674.00	$493.00	$0.00	$1,635.00	$865.00
$741.00	$543.00	$0.00	$1,799.00	$952.00
$3,536.00	$1,648.00	$0.00	$22,098.00	$8,738.00
10	4	0	23	26
$6,736.00	$1,973.00	$0.00	$37,606.00	$22,496.00
$674.00	$493.00	$0.00	$1,635.00	$865.00
$741.00	$543.00	$0.00	$1,799.00	$952.00
$3,166.00	$2,333.00	$1,000.00	$1,299.00	$9,054.00
9	7	2	2	28
$8,196.00	$4,211.00	$1,250.00	$4,269.00	$35,342.00
$911.00	$602.00	$625.00	$2,135.00	$1,262.00
$1,002.00	$662.00	$688.00	$2,348.00	$1,388.00
$33,416.00	$74,681.00	$3,442.00	$27,899.00	$31,203.00
130	363	18	84	126
$159,315.00	$222,087.00	$6,836.00	$155,973.00	$203,640.00
$1,225.00	$612.00	$391.00	$1,857.00	$1,623.00
$1,348.00	$672.00	$424.00	$2,043.00	$1,785.00

Statewide Rate Level Effect

Policy	Specialty/Class Code	Total Amount of Insurance (in 000s) ($)	Number of Policies	Earned Premium ($)	Current % Change (%)
GROUP 1	FL7.0511	$0.00	0.00	$0.00	0
GROUP 2	Symbol A	$36,020.00	63.00	$68,811.00	10.0
	Symbol AB	$16,852.00	48.00	$53,268.00	10.0
	Symbol B	$170,641.00	721.00	$747,851.00	9.9
	Symbol AA	$36,020.00	63.00	$68,811.00	10.0
	Total:	$259,533.00	895.00	$938,741.00	10.0

Program	Policy	Do you offer this?
HRA CNR (CC-F)	GROUP 2	Yes

Rating Example Description	Identical Risk (Yes or No)
Group 2 Perils: Windstorms or Hail, Smoke, Aircraft or Vehicles, Riot or Civil Commotion, Sinkhole Collapse or Action (Construction)	No

Risk Difference	Risk Type	Specialty/ Class Code
Wind or hail, debris removal, and pollutant clean up coverages only	Building	Symbol A
		Symbol AA
		Symbol AB
		Symbol B
	Contents	Symbol A
		Symbol AA
		Symbol AB
		Symbol B

Exposure Base	Data	001	002	003
v - Insured Value	Rate	0.0000	0.2270	0.1436
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.2270	0.1436
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.3384	0.2132
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.5586	0.3960
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.2084	0.1363
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.2084	0.1363
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.3182	0.2077
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.5326	0.3802
	U/W	No	Yes	Yes

004	005	006
0.1019	0.2798	0.3339
Yes	Yes	Yes
0.1019	0.2798	0.3339
Yes	Yes	Yes
0.1412	0.4276	0.4936
Yes	Yes	Yes
0.2642	0.7574	0.8155
Yes	Yes	Yes
0.0966	0.2565	0.3061
Yes	Yes	Yes
0.0966	0.2565	0.3061
Yes	Yes	Yes
0.1330	0.3920	0.4525
Yes	Yes	Yes
0.2623	0.6773	0.7821
Yes	Yes	Yes

Program	Policy	Territory Set
HRA CNR (CC-F)	GROUP 1	Default Commercial Property Group 1 Territory Set

Specialty/ Class Code	Data	001
FL7.0511	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	$0.00
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00

007	008	009
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00

Program	Policy	Territory Set
HRA CNR (CC-F)	GROUP 2	Default Commercial Property Group 2 Territory Set

Specialty/ Class Code	Data	001
Symbol A	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AA	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AB	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol B	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$2,170,138.00	$233,010.00	$150,702.00	$59,832.00	$143,837.00
4,817	503	322	103	299
$5,730,473.00	$388,753.00	$209,715.00	$186,875.00	$447,301.00
$1,190.00	$773.00	$651.00	$1,814.00	$1,496.00
$1,309.00	$849.00	$707.00	$1,996.00	$1,646.00
$2,170,138.00	$233,010.00	$150,702.00	$59,832.00	$143,837.00
4,817	503	322	103	299
$5,730,473.00	$388,753.00	$209,715.00	$186,875.00	$447,301.00
$1,190.00	$773.00	$651.00	$1,814.00	$1,496.00
$1,309.00	$849.00	$707.00	$1,996.00	$1,646.00
$2,496,515.00	$430,884.00	$400,720.00	$37,019.00	$65,387.00
5,827	1,050	793	56	131
$8,539,638.00	$949,131.00	$648,340.00	$174,794.00	$294,436.00
$1,466.00	$904.00	$818.00	$3,121.00	$2,248.00
$1,612.00	$993.00	$890.00	$3,433.00	$2,472.00
$1,902,263.00	$1,019,172.00	$745,919.00	$170,527.00	$160,699.00
5,668	3,116	2,020	403	489
$9,863,829.00	$3,594,072.00	$1,855,337.00	$1,165,612.00	$1,124,483.00
$1,740.00	$1,154.00	$919.00	$2,892.00	$2,302.00
$1,914.00	$1,266.00	$1,000.00	$3,182.00	$2,532.00

Statewide Rate Level Effect

Policy	Specialty/Class Code	Total Amount of Insurance (in 000s) ($)	Number of Policies	Earned Premium ($)	Current % Change (%)
GROUP 1	FL7.0511	$0.00	0.00	$0.00	0
GROUP 2	Symbol AB	$3,430,525.00	7,857.00	$10,606,339.00	9.9
	Symbol A	$2,757,519.00	6,044.00	$6,963,117.00	10.0
	Symbol B	$3,998,580.00	11,696.00	$17,603,333.00	9.8
	Symbol AA	$2,757,519.00	6,044.00	$6,963,117.00	10.0
	Total:	$12,944,143.00	31,641.00	$42,135,906.00	9.9

Program	Policy	Do you offer this?
HRA CNR (CC-G)	GROUP 2	Yes

Rating Example Description	Identical Risk (Yes or No)
Group 2 Perils: Windstorms or Hail, Smoke, Aircraft or Vehicles, Riot or Civil Commotion, Sinkhole Collapse or Action (Construction)	No

Risk Difference	Risk Type	Specialty/ Class Code
Wind or hail, debris removal, and pollutant clean up coverages only	Building	Symbol A
		Symbol AA
		Symbol AB
		Symbol B
	Contents	Symbol A
		Symbol AA
		Symbol AB
		Symbol B

Exposure Base	Data	001	002	003
v - Insured Value	Rate	0.0000	0.2719	0.1848
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.2719	0.1848
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.3154	0.1911
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.3141	0.2057
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.1735	0.1254
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.1735	0.1254
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.1953	0.1304
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	0.2085	0.1347
	U/W	No	Yes	Yes

004	005	006
0.1254	0.3392	0.3814
Yes	Yes	Yes
0.1254	0.3392	0.3814
Yes	Yes	Yes
0.1366	0.3933	0.4395
Yes	Yes	Yes
0.1353	0.3933	0.4395
Yes	Yes	Yes
0.0762	0.2257	0.2521
Yes	Yes	Yes
0.0762	0.2257	0.2521
Yes	Yes	Yes
0.0845	0.2626	0.2943
Yes	Yes	Yes
0.0905	0.2626	0.2943
Yes	Yes	Yes

Program	Policy	Territory Set
HRA CNR (CC-G)	GROUP 1	Default Commercial Property Group 1 Territory Set

Specialty/ Class Code	Data	001
FL7.0511	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	$0.00
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00

007	008	009
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00

Program	Policy	Territory Set
HRA CNR (CC-G)	GROUP 2	Default Commercial Property Group 2 Territory Set

Specialty/ Class Code	Data	001
Symbol A	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AA	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AB	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol B	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$9,920.00	$3,292.00	$2,000.00	$1,008.00	$2,102.00
13	5	2	2	3
$49,097.00	$5,457.00	$4,521.00	$9,464.00	$12,790.00
$3,777.00	$1,091.00	$2,261.00	$4,732.00	$4,263.00
$4,154.00	$1,201.00	$2,487.00	$5,205.00	$4,690.00
$9,920.00	$3,292.00	$2,000.00	$1,008.00	$2,102.00
13	5	2	2	3
$49,097.00	$5,457.00	$4,521.00	$9,464.00	$12,790.00
$3,777.00	$1,091.00	$2,261.00	$4,732.00	$4,263.00
$4,154.00	$1,201.00	$2,487.00	$5,205.00	$4,690.00
$11,019.00	$1,000.00	$2,774.00	$0.00	$0.00
15	1	4	0	0
$56,083.00	$6,234.00	$8,977.00	$0.00	$0.00
$3,739.00	$6,234.00	$2,244.00	$0.00	$0.00
$4,113.00	$6,857.00	$2,458.00	$0.00	$0.00
$71,038.00	$9,396.00	$11,527.00	$3,019.00	$3,399.00
180	23	24	8	10
$231,395.00	$16,568.00	$15,665.00	$9,992.00	$12,659.00
$1,286.00	$720.00	$667.00	$1,249.00	$1,332.00
$1,414.00	$791.00	$726.00	$1,374.00	$1,466.00

Statewide Rate Level Effect

Policy	Specialty/Class Code	Total Amount of Insurance (in 000s) ($)	Number of Policies	Earned Premium ($)	Current % Change (%)
GROUP 1	FL7.0511	$0.00	0.00	$0.00	0
GROUP 2	Symbol A	$18,322.00	25.00	$81,329.00	10
	Symbol AB	$14,793.00	20.00	$71,294.00	9.9
	Symbol AA	$18,322.00	25.00	$81,329.00	10
	Symbol B	$98,379.00	245.00	$286,279.00	9.9
	Total:	$149,816.00	315.00	$520,231.00	9.9

Program	Policy	Do you offer this?
HRA CNR (CC-H)	GROUP 2	Yes

Rating Example Description	Identical Risk (Yes or No)
Group 2 Perils: Windstorms or Hail, Smoke, Aircraft or Vehicles, Riot or Civil Commotion, Sinkhole Collapse or Action (Construction)	No

Risk Difference	Risk Type	Specialty/ Class Code
Wind or hail, debris removal, and pollutant clean up coverages only	Building	Symbol A
		Symbol AA
		Symbol AB
		Symbol B
	Contents	Symbol A
		Symbol AA
		Symbol AB
		Symbol B

Exposure Base	Data	001	002	003
v - Insured Value	Rate	0.0000	1.3055	0.9004
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	1.3055	0.9004
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	1.3055	0.9004
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	1.3055	0.9004
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	1.2034	0.8415
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	1.2034	0.8415
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	1.2034	0.8415
	U/W	No	Yes	Yes
v - Insured Value	Rate	0.0000	1.2034	0.8415
	U/W	No	Yes	Yes

004	005	006
0.5659	1.6468	1.6468
Yes	Yes	Yes
0.5659	1.6468	1.6468
Yes	Yes	Yes
0.5659	1.6468	1.6468
Yes	Yes	Yes
0.5659	1.6468	1.6468
Yes	Yes	Yes
0.5188	1.5096	1.5096
Yes	Yes	Yes
0.5188	1.5096	1.5096
Yes	Yes	Yes
0.5188	1.5096	1.5096
Yes	Yes	Yes
0.5188	1.5096	1.5096
Yes	Yes	Yes

Program	Policy	Territory Set
HRA CNR (CC-H)	GROUP 1	Default Commercial Property Group 1 Territory Set

Specialty/ Class Code	Data	001
FL7.0511	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	$0.00
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00
$0.00	$0.00	$0.00	$0.00	$0.00

007	008	009
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00
$0.00	$0.00	$0.00

Program	Policy	Territory Set
HRA CNR (CC-H)	GROUP 2	Default Commercial Property Group 2 Territory Set

Specialty/ Class Code	Data	001
Symbol A	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AA	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol AB	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00
Symbol B	Total Amount of Insurance (in 000s) ($)	$0.00
	Number of Policies	0
	Earned Premium ($)	$0.00
	Current Average Annual Premium ($)	$0.00
	Proposed Average Annual Premium ($)	$0.00

002	003	004	005	006
$393.00	$266.00	$155.00	$0.00	$41.00
4	8	4	0	2
$3,994.00	$1,851.00	$701.00	$0.00	$612.00
$999.00	$231.00	$175.00	$0.00	$306.00
$1,098.00	$255.00	$192.00	$0.00	$337.00
$393.00	$266.00	$155.00	$0.00	$41.00
4	8	4	0	2
$3,994.00	$1,851.00	$701.00	$0.00	$612.00
$999.00	$231.00	$175.00	$0.00	$306.00
$1,098.00	$255.00	$192.00	$0.00	$337.00
$105.00	$0.00	$0.00	$0.00	$0.00
1	0	0	0	0
$866.00	$0.00	$0.00	$0.00	$0.00
$866.00	$0.00	$0.00	$0.00	$0.00
$953.00	$0.00	$0.00	$0.00	$0.00
$1,503.00	$639.00	$537.00	$314.00	$771.00
18	10	4	3	15
$15,245.00	$4,627.00	$2,715.00	$4,552.00	$10,992.00
$871.00	$487.00	$679.00	$1,517.00	$733.00
$958.00	$536.00	$745.00	$1,669.00	$806.00

Statewide Rate Level Effect

Policy	Specialty/Class Code	Total Amount of Insurance (in 000s) ($)	Number of Policies	Earned Premium ($)	Current % Change (%)
GROUP 1	FL7.0511	$0.00	0.00	$0.00	0
GROUP 2	Symbol A	$855.00	18.00	$7,158.00	10.0
	Symbol B	$3,764.00	50.00	$38,131.00	10.0
	Symbol AA	$855.00	18.00	$7,158.00	10.0
	Symbol AB	$105.00	1.00	$866.00	10.0
	Total:	$5,579.00	87.00	$53,313.00	10.0

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification

(Basic Group II Rating Example)

Rate Table CC-D - Building - Symbol B - Seacoast Zone 2 (OIR Template Territory 03)

(1) HRA Territory	(2) Frame Inforce Premium as of 12/31/08	(3) Frame Base Rate (per $1,000) From commercial manual Page X-3	(4) Masonry Inforce Premium as of 12/31/08	(5) Masonry Base Rate (per $1,000) From commercial manual Page X-3	(6) Weighted Average Frame and Masonry Base Rate per $1,000 (6)=((2)*(3)+(4)*(5)) / ((2)+(4))	(7) Frame and Masonry Inforce Premium as of 12/31/08 (7)=(2)+(4)
41	0	2.955	0	2.955	2.955	0
42	10,982	3.445	62,337	3.445	3.445	73,319
56	0	3.158	898	3.158	3.158	898
57	291	3.158	3,425	3.158	3.158	3,716
58	0	3.158	0	3.158	3.158	0
59	5,302	3.445	20,259	3.158	3.218	25,561
60	650	3.445	13,365	3.445	3.445	14,015
61	774	3.445	6,319	3.445	3.445	7,093
62	1,994	3.445	6,812	3.445	3.445	8,806
63	0	3.445	2,383	3.445	3.445	2,383
64	0	2.955	7,423	2.955	2.955	7,423
65	0	3.445	0	3.445	3.445	0
66	147	3.445	2,167	3.158	3.176	2,314
67	79,791	3.445	40,171	3.445	3.445	119,962
68	10,802	3.445	22,269	3.445	3.445	33,071
69	0	2.955	841	2.955	2.955	841
70	0	3.445	388	3.445	3.445	388
71	2,490	3.097	804	3.097	3.097	3,294
72	0	3.445	0	3.445	3.445	0
73	5,840	3.445	52,002	3.248	3.268	57,842
74	425	3.158	30,660	3.158	3.158	31,085
75	2,706	3.445	970	3.445	3.445	3,676
88	0	3.158	0	3.158	3.158	0
						395,687

(1) Weighted average Frame and Masonry Base Rate per $1,000 for all territories 3.364

(2) Divide (1) by 10 to compute base rate per $100 0.3364

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification
(Basic Group II Rating Example)

Rate Table CC-E - Building - Symbol B - Seacoast Zone 2 (OIR Template Territory 03)

(1) HRA Territory	(2) Frame Inforce Premium as of 12/31/08	(3) Frame Base Rate (per $1,000) From commercial manual Page X-4	(4) Masonry Inforce Premium as of 12/31/08	(5) Masonry Base Rate (per $1,000) From commercial manual Page X-3	(6) Weighted Average Frame and Masonry Base Rate per $1,000 (6)=((2)*(3)+(4)*(5)) / ((2)+(4))	(7) Frame and Masonry Inforce Premium as of 12/31/08 (7)=(2)+(4)
41	1,267	4.076	2,871	2.955	3.298	4,138
42	6,286	4.752	224,263	3.445	3.481	230,549
56	0	4.356	0	3.158	3.757	0
57	10,805	4.356	2,464	3.158	4.134	13,269
58	729	4.356	0	3.158	4.356	729
59	23,036	4.356	37,145	3.158	3.617	60,181
60	2,226	4.699	58,267	3.445	3.491	60,493
61	0	4.752	2,276	3.445	3.445	2,276
62	0	4.752	20,042	3.445	3.445	20,042
63	0	4.752	31,875	3.445	3.445	31,875
64	0	4.076	4,832	2.955	2.955	4,832
65	1,874	4.752	1,438	3.445	4.185	3,312
66	2,637	4.356	0	3.158	4.356	2,637
67	37,675	4.752	51,244	3.445	3.999	88,919
68	11,799	4.752	28,938	3.445	3.824	40,737
69	6,052	4.076	10,322	2.955	3.369	16,374
70	11,227	4.752	30,520	3.445	3.796	41,747
71	0	4.272	21,146	3.097	3.097	21,146
72	562	4.752	0	3.445	4.752	562
73	2,733	4.371	47,727	3.253	3.314	50,460
74	20,830	4.356	122,187	3.158	3.332	143,017
75	4,629	4.752	4,226	3.445	4.128	8,855
88	0	4.356	521	3.158	3.158	521
						846,671

(1)	Weighted average Frame and Masonry Base Rate per $1,000 for all territories	3.549
(2)	Divide (1) by 10 to compute base rate per $100	0.3549

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification

(Basic Group II Rating Example)

Rate Table CC-F - Building - Symbol B - Seacoast Zone 2 (OIR Template Territory 03)

(1) HRA Territory	(2) Frame Inforce Premium as of 12/31/08	(3) Frame Base Rate (per $1,000) From commercial manual Page X-5	(4) Masonry Inforce Premium as of 12/31/08	(5) Masonry Base Rate (per $1,000) From commercial manual Page X-3	(6) Weighted Average Frame and Masonry Base Rate per $1,000 (6)=((2)*(3)+(4)*(5)) / ((2)+(4))	(7) Frame and Masonry Inforce Premium as of 12/31/08 (7)=(2)+(4)
41	17,981	4.37	68,655	3.227	3.464	86,636
42	82,395	5.095	383,079	3.762	3.998	465,474
56	3,406	4.67	13,548	3.448	3.693	16,954
57	19,999	4.67	3,473	3.448	4.489	23,472
58	3,844	4.67	9,194	3.448	3.808	13,038
59	200,036	4.67	253,334	3.448	3.987	453,370
60	63,818	4.67	275,621	3.448	3.678	339,439
61	10,493	5.095	13,425	3.762	4.347	23,918
62	102,361	5.095	372,355	3.762	4.049	474,716
63	68,594	5.095	45,103	3.762	4.566	113,697
64	26,525	4.37	68,952	3.227	3.545	95,477
65	52,719	4.785	49,805	3.625	4.221	102,524
66	15,780	4.67	17,436	3.448	4.029	33,216
67	434,439	5.095	342,354	3.762	4.508	776,793
68	39,645	5.095	70,196	3.762	4.243	109,841
69	2,651	4.37	5,619	3.227	3.593	8,270
70	34,902	4.67	44,069	3.448	3.988	78,971
71	40,986	4.58	38,219	3.382	4.002	79,205
72	6,346	5.095	1,150	3.762	4.890	7,496
73	174,520	4.67	1,189,206	3.448	3.604	1,363,726
74	92,314	4.67	333,895	3.448	3.713	426,209
75	376,098	4.67	216,203	3.448	4.224	592,301
88	40,107	4.67	135,831	3.448	3.727	175,938
						5,860,681

(1) Weighted average Frame and Masonry Base Rate per $1,000 for all territories 3.960

(2) Divide (1) by 10 to compute base rate per $100 0.3960

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification

(Basic Group II Rating Example)

Rate Table CC-G - Building - Symbol B - Seacoast Zone 2 (OIR Template Territory 03)

(1) HRA Territory	(2) Frame Inforce Premium as of 12/31/08	(3) Frame Base Rate (per $1,000) From commercial manual Page X-6	(4) Masonry Inforce Premium as of 12/31/08	(5) Masonry Base Rate (per $1,000) From commercial manual Page X-3	(6) Weighted Average Frame and Masonry Base Rate per $1,000 (6)=((2)*(3)+(4)*(5)) / ((2)+(4))	(7) Frame and Masonry Inforce Premium as of 12/31/08 (7)=(2)+(4)
41	0	1.789	330	1.789	1.789	330
42	0	2.085	7,662	2.085	2.085	7,662
56	0	2.085	0	1.911	1.998	0
57	0	2.085	0	2.025	2.055	0
58	0	2.085	0	1.911	1.998	0
59	954	2.085	3,384	2.085	2.085	4,338
60	0	2.085	0	2.085	2.085	0
61	0	2.085	0	2.085	2.085	0
62	2,281	2.085	0	2.085	2.085	2,281
63	0	2.085	0	2.085	2.085	0
64	0	1.952	0	1.789	1.871	0
65	0	2.085	0	2.085	2.085	0
66	1,091	2.085	1,518	2.085	2.085	2,609
67	248	2.085	735	2.085	2.085	983
68	0	2.085	0	2.085	2.085	0
69	493	1.789	0	1.789	1.789	493
70	1,441	2.085	0	2.085	2.085	1,441
71	0	1.875	0	1.875	1.875	0
72	0	2.085	0	2.085	2.085	0
73	337	2.085	4,865	2.085	2.085	5,202
74	948	2.085	1,446	1.914	1.982	2,394
75	940	2.085	0	2.085	2.085	940
88	349	2.085	2,136	1.911	1.935	2,485
						31,158

(1)	Weighted average Frame and Masonry Base Rate per $1,000 for all territories	2.057
(2)	Divide (1) by 10 to compute base rate per $100	0.2057

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification

(Basic Group II Rating Example)

Rate Table CC-H - Building - Symbol AA - Seacoast Zone 1 (OIR Template Territory 0

HRA Terr.	Building Base Rate (per $1,000) From commercial manual Page X-7	Building Inforce Premium as of 12/31/08
30	12.053	0
31	12.053	1,597
32	13.126	5,543
34	13.126	3,863
35	13.126	3,598
36	13.126	0
37	13.126	1,856
38	13.126	3,494
76	12.053	0
77	13.126	0
87	13.126	4,254
		24,205

(1)	Weighted avg. WR base rate per $1,000	13.06
(2)	Divide (1) by 10 to compute base rate per $100	1.3055

Rate Table CC-H Territory Number
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Description	Building Base Rate Per $1,000 — Combined Hurricane and Other Wind	County	Terr. Number	Rate Table CC-H — Building Inforce Premiums as of 12/31/08 — Combined Hurricane and Other Wind
Bay	8.486	Bay	59	99
Brevard	9.193	Brevard	60	0
Broward	13.126	Broward	35	3598
Broward	13.126	Broward	36	0
Broward	13.126	Broward	37	1856
Charlotte	9.258	Charlotte	61	0
Collier	9.258	Collier	62	673
Dade	12.053	Dade	30	0
Dade	12.053	Dade	31	1597
Dade	13.126	Dade	32	5543
Dade	13.126	Dade	34	3863
Duval	7.941	Duval	41	0
Escambia	5.683	Escambia	43	2549
Escambia	9.258	Escambia	63	0
Flagler	7.941	Flagler	64	0
Flagler	5.21	Flagler	78	0
Franklin	9.258	Franklin	65	1380
Gulf	8.486	Gulf	66	0
Hernando	8.486	Hernando	56	0
Indian River	12.053	Indian River	76	0
Lee	9.258	Lee	67	868
Lee	5.683	Lee	79	0
Levy	8.486	Levy	57	0
Manatee	9.258	Manatee	68	0
Monroe	16.468	Monroe	85	7973
Monroe	16.468	Monroe	86	4346
Nassau	7.941	Nassau	69	0
Okaloosa	9.258	Okaloosa	70	0
Palm Beach	13.126	Palm Beach	38	3494
Palm Beach	13.126	Palm Beach	87	4254
Pasco	8.486	Pasco	88	231
Pinellas	8.881	Pinellas	42	0
Saint Johns	8.323	Saint Johns	71	0

Saint Lucie	13.126
Santa Rosa	9.258
Santa Rosa	5.683
Sarasota	8.957
Sarasota	5.683
Volusia	5.025
Volusia	7.793
Wakulla	8.486
Walton	9.258

Saint Lucie	77	0
Santa Rosa	72	0
Santa Rosa	80	0
Sarasota	73	967
Sarasota	81	0
Volusia	44	95
Volusia	74	605
Wakulla	58	0
Walton	75	821

CITIZENS PROPERTY I

Mapping from HRA Construction Class t

HRA Construction Class

Frame

Masonry

Semi Wind Resistive

Wind Resistive

The figures entere in the OIR templat

Symbol AA =

Symbol AB =

Symbol B =

Symbol A =

o ISO Basic Group II Construction Class

ISO Basic Group II Construction Class
B
B
AB
Average of A and AA

es were developed as follows:

Wind Resistive

Semi Wind Resistive

(Frame + Masonry) / 2

Wind Resistive

CITIZENS PROPERTY INSURANCE CORPORATION

Mapping of HRA territories to ISO territories

CPIC_TERR	ISO_TERR	COUNTY	**ISO Territory Number**
30	1	DADE	4
31	1	DADE	1
32	1	DADE	2
34	1	DADE	3
35	1	BROWARD	KW
36	1	BROWARD	EKW
37	1	BROWARD	
38	1	PALM BEACH	
76	1	INDIAN RIVER	
77	1	ST. LUCIE	
87	1	PALM BEACH	
41	2	DUVAL	
42	2	PINELLAS	
56	2	HERNANDO	
57	2	LEVY	
58	2	WAKULLA	
59	2	BAY	
60	2	BREVARD	
61	2	CHARLOTTE	
62	2	COLLIER	
63	2	ESCAMBIA	
64	2	FLAGLER	
65	2	FRANKLIN	
66	2	GULF	
67	2	LEE	
68	2	MANATEE	
69	2	NASSAU	
70	2	OKALOOSA	
71	2	ST. JOHNS	
72	2	SANTA ROSA	
73	2	SARASOTA	
74	2	VOLUSIA	
75	2	WALTON	
88	2	PASCO	
43	3	ESCAMBIA	
44	3	VOLUSIA	
78	3	FLAGLER	
79	3	LEE	
80	3	SANTA ROSA	
81	3	SARASOTA	
85	EKW	MONROE	
86	KW	MONROE	

ISO Territory Description	OIR Template Column
Inland	1
Seacoast 1	2
Seacoast 2	3
Seacoast 3	4
Monroe (Key West)	5
Monroe (excluding Key West)	6

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification
(Basic Group II Rating Example)

Rate Table CC-D - Contents - Symbol B - Seacoast Zone 2 (OIR Template Territory 03)

(1) HRA Territory	(2) Frame Inforce Premium as of 12/31/08	(3) Frame Base Rate (per $1,000) From commercial manual Page X-3	(4) Masonry Inforce Premium as of 12/31/08	(5) Masonry Base Rate (per $1,000) From commercial manual Page X-3	(6) Weighted Average Frame and Masonry Base Rate per $1,000 (6)=((2)*(3)+(4)*(5)) / ((2)+(4))	(7) Frame and Masonry Inforce Premium as of 12/31/08 (7)=(2)+(4)
41	0	2.955	0	2.955	2.955	0
42	962	3.445	6,466	3.421	3.424	7,428
56	0	3.158	56	3.158	3.158	56
57	0	3.158	280	3.158	3.158	280
58	0	3.158	0	3.158	3.158	0
59	705	3.158	1,733	3.158	3.158	2,438
60	102	3.158	1,489	3.158	3.158	1,591
61	31	3.445	473	3.158	3.176	504
62	353	3.445	734	3.312	3.355	1,087
63	0	3.445	362	3.158	3.158	362
64	0	2.955	288	2.955	2.955	288
65	0	3.445	0	3.158	3.302	0
66	34	3.158	301	3.158	3.158	335
67	19,137	3.445	5,450	3.158	3.381	24,587
68	1,365	3.445	1,354	3.245	3.345	2,719
69	0	2.955	0	2.955	2.955	0
70	0	3.219	37	3.158	3.158	37
71	576	3.097	169	3.097	3.097	745
72	0	3.445	0	3.158	3.302	0
73	278	3.158	3,163	3.158	3.158	3,441
74	65	3.158	2,256	3.158	3.158	2,321
75	212	3.265	55	3.158	3.243	267
88	0	3.158	0	3.158	3.158	0
						48,486

(1)	Weighted average Frame and Masonry Base Rate per $1,000 for all territories	3.325	
(2)	Divide (1) by 10 to compute base rate per $100	0.3325	

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification
(Basic Group II Rating Example)

Rate Table CC-E - Contents - Symbol B - Seacoast Zone 2 (OIR Template Territory 03)

(1)	(2)	(3)	(4)	(5)	(6)	(7)
HRA Territory	Frame Inforce Premium as of 12/31/08	Frame Base Rate (per $1,000) From commercial manual Page X-4	Masonry Inforce Premium as of 12/31/08	Masonry Base Rate (per $1,000) From commercial manual Page X-3	Weighted Average Frame and Masonry Base Rate per $1,000 (6)=((2)*(3)+(4)*(5)) / ((2)+(4))	Frame and Masonry Inforce Premium as of 12/31/08 (7)=(2)+(4)
41	246	4.076	0	2.955	4.076	246
42	401	4.752	11,041	3.432	3.478	11,442
56	0	4.356	0	3.158	3.757	0
57	715	4.356	146	3.158	4.153	861
58	0	4.356	0	3.158	3.757	0
59	2,743	4.356	3,205	3.158	3.710	5,948
60	297	4.356	7,438	3.158	3.204	7,735
61	0	4.653	96	3.159	3.159	96
62	0	4.752	2,727	3.322	3.322	2,727
63	0	4.491	1,712	3.158	3.158	1,712
64	0	4.076	172	2.955	2.955	172
65	0	4.356	95	3.158	3.158	95
66	429	4.356	0	3.158	4.356	429
67	2,199	4.356	3,906	3.158	3.590	6,105
68	825	4.748	763	3.254	4.030	1,588
69	339	4.076	644	2.955	3.342	983
70	5,449	4.356	2,405	3.158	3.989	7,854
71	0	4.272	945	3.097	3.097	945
72	349	4.62	0	3.158	4.620	349
73	345	4.356	2,126	3.158	3.325	2,471
74	3,492	4.356	10,522	3.158	3.457	14,014
75	771	4.356	482	3.158	3.895	1,253
88	0	4.356	0	3.158	3.757	0
						67,025

(1) Weighted average Frame and Masonry Base Rate per $1,000 for all territories 3.546

(2) Divide (1) by 10 to compute base rate per $100 0.3546

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification

(Basic Group II Rating Example)

Rate Table CC-F - Contents - Symbol B - Seacoast Zone 2 (OIR Template Territory 03)

(1) HRA Territory	(2) Frame Inforce Premium as of 12/31/08	(3) Frame Base Rate (per $1,000) From commercial manual Page X-5	(4) Masonry Inforce Premium as of 12/31/08	(5) Masonry Base Rate (per $1,000) From commercial manual Page X-3	(6) Weighted Average Frame and Masonry Base Rate per $1,000 (6)=((2)*(3)+(4)*(5)) / ((2)+(4))	(7) Frame and Masonry Inforce Premium as of 12/31/08 (7)=(2)+(4)
41	2,361	4.37	26,436	3.227	3.321	28,797
42	18,991	4.67	75,903	3.448	3.693	94,894
56	338	4.67	750	3.448	3.828	1,088
57	2,975	4.67	480	3.448	4.500	3,455
58	1,297	4.67	1,373	3.448	4.042	2,670
59	55,656	4.67	66,690	3.448	4.004	122,346
60	7,766	4.67	78,701	3.448	3.558	86,467
61	909	4.67	1,924	3.448	3.840	2,833
62	14,196	4.67	87,602	3.448	3.618	101,798
63	13,533	4.67	10,939	3.448	4.124	24,472
64	2,927	4.37	11,826	3.227	3.454	14,753
65	8,405	4.67	14,639	3.448	3.894	23,044
66	2,518	4.67	5,507	3.448	3.831	8,025
67	83,289	4.67	69,477	3.448	4.114	152,766
68	7,803	4.67	15,857	3.448	3.851	23,660
69	308	4.37	2,788	3.227	3.341	3,096
70	6,525	4.67	11,977	3.448	3.879	18,502
71	4,311	4.58	5,968	3.382	3.884	10,279
72	2,204	4.67	370	3.448	4.494	2,574
73	41,716	4.67	252,146	3.448	3.621	293,862
74	18,113	4.67	84,054	3.448	3.665	102,167
75	93,605	4.67	86,198	3.448	4.084	179,803
88	4,200	4.67	21,912	3.448	3.645	26,112
						1,327,463
(1)	Weighted average Frame and Masonry Base Rate per $1,000 for all territories				3.802	
(2)	Divide (1) by 10 to compute base rate per $100				0.3802	

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification
(Basic Group II Rating Example)

Rate Table CC-G - Contents - Symbol B - Seacoast Zone 2 (OIR Template Territory 03)

(1) HRA Territory	(2) Frame Inforce Premium as of 12/31/08	(3) Frame Base Rate (per $1,000) From commercial manual Page X-6	(4) Masonry Inforce Premium as of 12/31/08	(5) Masonry Base Rate (per $1,000) From commercial manual Page X-3	(6) Weighted Average Frame and Masonry Base Rate per $1,000 (6)=((2)*(3)+(4)*(5)) / ((2)+(4))	(7) Frame and Masonry Inforce Premium as of 12/31/08 (7)=(2)+(4)
41	0	1.189	0	1.189	1.189	0
42	0	1.386	163	1.386	1.386	163
56	0	1.27	0	1.27	1.270	0
57	0	1.386	0	1.27	1.328	0
58	0	1.292	0	1.27	1.281	0
59	48	1.386	132	1.27	1.301	180
60	0	1.386	0	1.386	1.386	0
61	0	1.386	0	1.386	1.386	0
62	36	1.386	0	1.386	1.386	36
63	0	1.386	0	1.386	1.386	0
64	0	1.189	0	1.189	1.189	0
65	0	1.386	0	1.386	1.386	0
66	72	1.386	128	1.386	1.386	200
67	63	1.386	15	1.386	1.386	78
68	0	1.386	0	1.386	1.386	0
69	166	1.189	0	1.189	1.189	166
70	239	1.386	0	1.386	1.386	239
71	0	1.246	0	1.246	1.246	0
72	0	1.386	0	1.386	1.386	0
73	0	1.386	452	1.386	1.386	452
74	38	1.386	12	1.27	1.358	50
75	170	1.386	0	1.386	1.386	170
88	0	1.27	244	1.27	1.270	244
						1,978

(1)	Weighted average Frame and Masonry Base Rate per $1,000 for all territories	1.347
(2)	Divide (1) by 10 to compute base rate per $100	0.1347

CITIZENS PROPERTY INSURANCE CORPORATION

HRA Commercial Non-Residential RCS Verification
(Basic Group II Rating Example)

Rate Table CC-H - Contents - Symbol AA - Seacoast Zone 1 (OIR Template Territory 0

HRA Terr.	Contents Base Rate (per $1,000) From commercial manual Page X-7	Contents Inforce Premium as of 12/31/08
30	12.053	0
31	12.053	1,384
32	12.031	774
34	12.031	2,259
35	12.031	1,104
36	13.126	0
37	12.031	888
38	12.031	2,995
76	11.049	0
77	12.031	248
87	12.031	1,493
		11,145

(1)	Weighted avg. WR base rate per $1,000	12.03
(2)	Divide (1) by 10 to compute base rate per $100	1.2034

Rate Table CC-H Territory Number
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	Contents Base Rate Per $1,000
Description	**Combined Hurricane and Other Wind**
Bay	8.486
Brevard	8.486
Broward	12.031
Broward	13.126
Broward	12.031
Charlotte	8.486
Collier	8.486
Dade	12.053
Dade	12.053
Dade	12.031
Dade	12.031
Duval	7.941
Escambia	5.21
Escambia	8.486
Flagler	7.941
Flagler	5.21
Franklin	8.486
Gulf	8.486
Hernando	8.486
Indian River	11.049
Lee	8.486
Lee	5.21
Levy	8.486
Manatee	8.486
Monroe	15.096
Monroe	15.096
Nassau	7.941
Okaloosa	8.486
Palm Beach	12.031
Palm Beach	12.031
Pasco	8.486
Pinellas	8.141
Saint Johns	8.323

Rate Table CC-H		**Contents Inforce Premiums as of 12/31/08**
	Terr.	Combined Hurricane and Other Wind
County	**Number**	
Bay	59	46
Brevard	60	0
Broward	35	1104
Broward	36	0
Broward	37	888
Charlotte	61	0
Collier	62	193
Dade	30	0
Dade	31	1384
Dade	32	774
Dade	34	2259
Duval	41	0
Escambia	43	681
Escambia	63	0
Flagler	64	0
Flagler	78	0
Franklin	65	1039
Gulf	66	0
Hernando	56	0
Indian River	76	0
Lee	67	302
Lee	79	0
Levy	57	0
Manatee	68	0
Monroe	85	3631
Monroe	86	206
Nassau	69	0
Okaloosa	70	0
Palm Beach	38	2995
Palm Beach	87	1493
Pasco	88	39
Pinellas	42	606
Saint Johns	71	0

Saint Lucie	12.031
Santa Rosa	8.486
Santa Rosa	5.21
Sarasota	8.486
Sarasota	5.21
Volusia	5.025
Volusia	7.793
Wakulla	8.486
Walton	8.486

Saint Lucie	77	248
Santa Rosa	72	0
Santa Rosa	80	0
Sarasota	73	2415
Sarasota	81	0
Volusia	44	91
Volusia	74	258
Wakulla	58	0
Walton	75	562

CITIZENS PROPERTY I

Mapping from HRA Construction Class t

HRA Construction Class

Frame

Masonry

Semi Wind Resistive

Wind Resistive

The figures entere in the OIR templat

Symbol AA =

Symbol AB =

Symbol B =

Symbol A =

o ISO Basic Group II Construction Class

ISO Basic Group II Construction Class
B
B
AB
Average of A and AA

es were developed as follows:

Wind Resistive

Semi Wind Resistive

(Frame + Masonry) / 2

Wind Resistive

CITIZENS PROPERTY INSURANCE CORPORATION

Mapping of HRA territories to ISO territories

CPIC_TERR	ISO_TERR	COUNTY	**ISO Territory Number**
30	1	DADE	4
31	1	DADE	1
32	1	DADE	2
34	1	DADE	3
35	1	BROWARD	KW
36	1	BROWARD	EKW
37	1	BROWARD	
38	1	PALM BEACH	
76	1	INDIAN RIVER	
77	1	ST. LUCIE	
87	1	PALM BEACH	
41	2	DUVAL	
42	2	PINELLAS	
56	2	HERNANDO	
57	2	LEVY	
58	2	WAKULLA	
59	2	BAY	
60	2	BREVARD	
61	2	CHARLOTTE	
62	2	COLLIER	
63	2	ESCAMBIA	
64	2	FLAGLER	
65	2	FRANKLIN	
66	2	GULF	
67	2	LEE	
68	2	MANATEE	
69	2	NASSAU	
70	2	OKALOOSA	
71	2	ST. JOHNS	
72	2	SANTA ROSA	
73	2	SARASOTA	
74	2	VOLUSIA	
75	2	WALTON	
88	2	PASCO	
43	3	ESCAMBIA	
44	3	VOLUSIA	
78	3	FLAGLER	
79	3	LEE	
80	3	SANTA ROSA	
81	3	SARASOTA	
85	EKW	MONROE	
86	KW	MONROE	

ISO Territory Description	OIR Template Column
Inland	1
Seacoast 1	2
Seacoast 2	3
Seacoast 3	4
Monroe (Key West)	5
Monroe (excluding Key West)	6