



9800 Fredericksburg Road
San Antonio, Texas 78288

FOR INFORMATIONAL PURPOSES ONLY

Date Received: 5/18/2015 Date Of Action: 06/24/2015
FL OFFICE OF INSURANCE REGULATION

May 17, 2015

Director Kevin M. McCarty
Florida Department of Financial Services
Office of Insurance Regulation
Bureau of Property/Casualty Forms and Rates
200 E. Gaines St.
Tallahassee, Florida 32399-0330

ATTENTION: Property and Casualty Product Review

REGARDING: UNITED SERVICES AUTOMOBILE ASSOCIATION - NAIC# 200-25941
USAA CASUALTY INSURANCE COMPANY - NAIC# 200-25968
USAA GENERAL INDEMNITY COMPANY - NAIC #200-18600
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY #200-21253
Homeowners Program
Underwriting Guidelines
Company File # **FL1519688**

SUBMITTED UNDER "FILE & USE" PROVISIONS

Dear Director McCarty:

United Services Automobile Association (USAA) and its affiliates, USAA Casualty Insurance Company (USAA-CIC) and USAA General Indemnity Company (USAA-GIC), are submitting revisions to our currently filed Underwriting Guidelines. A markup and explanatory memo are attached showing the changes.

Also, we are including Garrison Property and Casualty Insurance Company (Garrison) with this submission to introduce the Homeowners Underwriting Guidelines to it.

This filing resubmits the changes included in FL OIR #15-02019 that we recently withdrew and some additional changes.

Your acknowledgement of this filing submission for policies effective on or after June 30, 2015 is requested. If there are questions, please call me at (800) 531-8722, ext. 83281. The facsimile number is (866) 649-8999 and my e-mail address is melissa.wagstaff@usaa.com.

Sincerely,

MELISSA WAGSTAFF
Compliance Analyst
Regulatory Compliance

Enclosures

We are revising our Underwriting Guidelines with this submission. They are attached under the Trade Secret Supplementary Information component.

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Filing Details

Work Unit Number: W15-1447877
Filing Purpose: Rules Only
Product: Homeowners Multi-Peril
Date Created: 5/17/2015 05:25:31 PM
Date Submitted: 5/18/2015 08:00:00 AM
Filing Name: Homeowners UW Guidelines

Company Details

Company Name	FEIN	NAIC CC	NAIC GC	AUTH TYPE	AUTH TYPE/LOB Statuses
UNITED SERVICES AUTOMOBILE ASSOCIATION	740959140	25941	0200	COA	ACTIVE/ ACTIVE
USAA CASUALTY INSURANCE COMPANY	593019540	25968	0200	COA	ACTIVE/ ACTIVE
USAA GENERAL INDEMNITY COMPANY	741718283	18600	0200	COA	ACTIVE/ ACTIVE
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY	431803614	21253	0200	COA	ACTIVE/ ACTIVE

Section II: Contact Information

Filing Correspondence

Preferred Email Type: ORIGINATOR
Preferred Email: melissa.wagstaff@usaa.com
Additional Emails:

Filing Originator Information

Contact Name: Ms. Melissa Wagstaff
Contact Title: Sr Compliance Advisor
Professional Designation:
Contact Email: melissa.wagstaff@usaa.com
Street Address: 9800 Fredericksburg Road
Suite/Room #: A-03-W
P.O. Box Mailing Address:
Department: Insurance Regulatory Compliance
City: San Antonio
State: TX
Zip Code: 78288-1033
Country: USA
Non US Postal Code:
Phone Number: 210-498-3281 **Ext**
Fax Number: 866-649-8999
Toll Free Number: 800-531-8722 **Ext** 83281
Non US Phone Number:

Company Contact Information

Contact Name: Ms. Melissa Wagstaff
Contact Title: Sr Compliance Advisor
Professional Designation:
Contact Email: melissa.wagstaff@usaa.com
Street Address: 9800 Fredericksburg Road
Suite/Room #: A-03-W
P.O. Box Mailing Address:
Department: Insurance Regulatory Compliance

City: San Antonio
State: TX
Zip Code: 78288-1033
Country: USA
Non US Postal Code:
Phone Number: 210-498-3281 **Ext**
Fax Number: 866-649-8999
Toll Free Number: 800-531-8722 **Ext** 83281
Non US Phone Number:

General Information

Company Filing Number FL1519688
New Business Effective Date 7 /25/2015
Renewal Business Effective Date 7 /25/2015
Product: Homeowners Multi-Peril
Are you writing new business in Florida for this line of business? Yes

Filing Content Information

This is a Rules Only filing.

Type of Coverage:

Homeowners/Mobile Homeowners/Dwelling Fire

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 0
Rate Indicated 0
Earned Premium Volume (all programs affected by this filing) 0
Number of Policies (all programs affected by this filing) 0

Uploaded Documents

Document Type	Filenet Number	Form Number	Title	Trade Secret
Cover Letter	0		Cover Letter	<input type="checkbox"/>
Explanatory Memorandum	0		Note	<input type="checkbox"/>

Miscellaneous	0		Note	<input type="checkbox"/>
Miscellaneous	0		Additional Rules Information - Note	<input type="checkbox"/>
Explanatory Memorandum	0		Explanatory Memorandum	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		FL Homeowners Appendix I	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		FL Homeowners Appendix I Marked Copy	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		FL Homeowners Appendix II	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		FL Homeowners Appendix II Marked Copy	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		FL Homeowners New Business	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		FL Homeowners New Business Marked Copy	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		FL Homeowners Renewal Business	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		FL Homeowners Renewal Business Marked Copy	<input checked="" type="checkbox"/>

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: Melissa Wagstaff

Title: Sr Compliance Advisor

Filing Details

Work Unit Number: W15-1447877
Filing Purpose: Rules Only
Product: Homeowners Multi-Peril
Date Created: 5/17/2015 05:25:31 PM
Date Submitted: 5/18/2015 08:00:00 AM
Filing Name: Homeowners UW Guidelines

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 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

Filing Details

Work Unit Number: W15-1461357
Filing Purpose: Rules Only
Product: Homeowners Multi-Peril
Date Created: 6/3/2015 12:23:19 PM
Date Submitted: 6/3/2015 12:46:00 PM
Filing Name: Homeowners UW Guidelines

Company Details

Company Name	FEIN	NAIC CC	NAIC GC	AUTH TYPE	AUTH TYPE/LOB Statuses
UNITED SERVICES AUTOMOBILE ASSOCIATION	740959140	25941	0200	COA	ACTIVE/ ACTIVE
USAA CASUALTY INSURANCE COMPANY	593019540	25968	0200	COA	ACTIVE/ ACTIVE
USAA GENERAL INDEMNITY COMPANY	741718283	18600	0200	COA	ACTIVE/ ACTIVE
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY	431803614	21253	0200	COA	ACTIVE/ ACTIVE

Uploaded Documents

Document Type	Filenet Number	Form Number	Title	Trade Secret
Underwriting Guidelines	0		Renewal Underwriting Guidelines	<input checked="" type="checkbox"/>

Filing Details

Work Unit Number: W15-1465561
Filing Purpose: Rules Only
Product: Homeowners Multi-Peril
Date Created: 6/15/2015 04:34:49 PM
Date Submitted: 6/15/2015 04:40:14 PM
Filing Name: Homeowners UW Guidelines

Company Details

Company Name	FEIN	NAIC CC	NAIC GC	AUTH TYPE	AUTH TYPE/LOB Statuses
UNITED SERVICES AUTOMOBILE ASSOCIATION	740959140	25941	0200	COA	ACTIVE/ ACTIVE
USAA CASUALTY INSURANCE COMPANY	593019540	25968	0200	COA	ACTIVE/ ACTIVE
USAA GENERAL INDEMNITY COMPANY	741718283	18600	0200	COA	ACTIVE/ ACTIVE
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY	431803614	21253	0200	COA	ACTIVE/ ACTIVE

Uploaded Documents

Document Type	Filenet Number	Form Number	Title	Trade Secret
Correspondence	0		Response to Telephone Inquiry	<input checked="" type="checkbox"/>

Filing Details

Work Unit Number: W15-1466550
Filing Purpose: Rules Only
Product: Homeowners Multi-Peril
Date Created: 6/19/2015 01:21:16 PM
Date Submitted: 6/19/2015 01:24:51 PM
Filing Name: Homeowners UW Guidelines

Company Details

Company Name	FEIN	NAIC CC	NAIC GC	AUTH TYPE	AUTH TYPE/LOB Statuses
UNITED SERVICES AUTOMOBILE ASSOCIATION	740959140	25941	0200	COA	ACTIVE/ ACTIVE
USAA CASUALTY INSURANCE COMPANY	593019540	25968	0200	COA	ACTIVE/ ACTIVE
USAA GENERAL INDEMNITY COMPANY	741718283	18600	0200	COA	ACTIVE/ ACTIVE
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY	431803614	21253	0200	COA	ACTIVE/ ACTIVE

Uploaded Documents

Document Type	Filenet Number	Form Number	Title	Trade Secret
Correspondence	0		Response to 06/17/2015 Telephone Inquiry	<input checked="" type="checkbox"/>
Miscellaneous	0		Appendix I Changes	<input checked="" type="checkbox"/>
Miscellaneous	0		Appendix II Changes	<input checked="" type="checkbox"/>

Filing Details

Work Unit Number: W15-1467301
Filing Purpose: Rules Only
Product: Homeowners Multi-Peril
Date Created: 6/24/2015 12:21:55 PM
Date Submitted: 6/24/2015 12:24:06 PM
Filing Name: Homeowners UW Guidelines

Company Details

Company Name	FEIN	NAIC CC	NAIC GC	AUTH TYPE	AUTH TYPE/LOB Statuses
UNITED SERVICES AUTOMOBILE ASSOCIATION	740959140	25941	0200	COA	ACTIVE/ ACTIVE
USAA CASUALTY INSURANCE COMPANY	593019540	25968	0200	COA	ACTIVE/ ACTIVE
USAA GENERAL INDEMNITY COMPANY	741718283	18600	0200	COA	ACTIVE/ ACTIVE
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY	431803614	21253	0200	COA	ACTIVE/ ACTIVE

Uploaded Documents

Document Type	Filenet Number	Form Number	Title	Trade Secret
Correspondence	0		Response to 06/23/2015 Telephone Inquiry	<input checked="" type="checkbox"/>

FOR INFORMATIONAL PURPOSES ONLY

Date Received: Date Of Action:
5/18/2015 06/24/2015

FL OFFICE OF INSURANCE REGULATION

Final Pages:

We have attached the final Underwriting Guidelines with the revised effective date of 08-22-2015 for new and renewal business.

Filing Details

Work Unit Number: W15-1467400
Filing Purpose: Rules Only
Product: Homeowners Multi-Peril
Date Created: 6/24/2015 04:51:45 PM
Date Submitted: 6/25/2015 08:00:00 AM
Filing Name: Homeowners UW Guidelines

Company Details

Company Name	FEIN	NAIC CC	NAIC GC	AUTH TYPE	AUTH TYPE/LOB Statuses
UNITED SERVICES AUTOMOBILE ASSOCIATION	740959140	25941	0200	COA	ACTIVE/ ACTIVE
USAA CASUALTY INSURANCE COMPANY	593019540	25968	0200	COA	ACTIVE/ ACTIVE
USAA GENERAL INDEMNITY COMPANY	741718283	18600	0200	COA	ACTIVE/ ACTIVE
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY	431803614	21253	0200	COA	ACTIVE/ ACTIVE

Uploaded Documents

Document Type	Filenet Number	Form Number	Title	Trade Secret
Underwriting Guidelines	0		New Business Underwriting Guidelines	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		Renewal Business Underwriting Guidelines	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		Appendix I Effective 08-22-2015	<input checked="" type="checkbox"/>
Underwriting Guidelines	0		Appendix II Effective 08-22-2015	<input checked="" type="checkbox"/>
Correspondence	0		Change of Effective Date	<input type="checkbox"/>



OFFICE OF INSURANCE REGULATION

KEVIN M. MCCARTY
COMMISSIONER

June 24, 2015

Ms. Melissa Wagstaff
Sr Compliance Advisor
United Services Automobile Association
9800 Fredericksburg Road
A-03-w
San Antonio, TX 78288-1033

RE: United Services Automobile Association
Garrison Property and Casualty Insurance Company
USAA General Indemnity Company
USAA Casualty Insurance Company
Homeowners Multi-Peril
Company File Number: FL1519688
OIR File Number: FCP 15-10861

PLEASE REFER TO THE OIR FILE NUMBER WHEN CORRESPONDING

Dear Ms. Wagstaff:

Attached for your records is a copy of the original cover letter stamped "informational" and a set of manual pages stamped "approved" for the above referenced filing. This letter does not represent an approval of the methodology used to derive the rates on the stamped manual pages.

Our records indicate that this filing is effective 7/25/2015 for new business and 7/25/2015 for renewal business.

Please verify that these pages are the final printed manual pages intended for use with this filing and that the effective dates noted above are correct. **If we do not hear from you within the next 10 days, we will assume that you have received a stamped copy of all manual pages applicable to this filing and that the effective dates are correct.**

Sincerely,

Office of Insurance Regulation

FINANCIAL SERVICES
COMMISSION

RICK SCOTT
GOVERNOR

JEFF ATWATER
CHIEF FINANCIAL OFFICER

PAM BONDI
ATTORNEY GENERAL

ADAM PUTNAM
COMMISSIONER OF
AGRICULTURE



OFFICE OF INSURANCE REGULATION

KEVIN M. MCCARTY
COMMISSIONER

June 24, 2015

Ms. Melissa Wagstaff
Sr Compliance Advisor
United Services Automobile Association
9800 Fredericksburg Road
A-03-w
San Antonio, TX 78288-1033

RE: United Services Automobile Association
Garrison Property and Casualty Insurance Company
USAA General Indemnity Company
USAA Casualty Insurance Company
Homeowners Multi-Peril
Company File Number: FL1519688
OIR File Number: FCP 15-10861

PLEASE REFER TO THE OIR FILE NUMBER WHEN CORRESPONDING

Dear Ms. Wagstaff:

Attached for your records is a copy of the original cover letter stamped "informational" and a set of manual pages stamped "approved" for the above referenced filing. This letter does not represent an approval of the methodology used to derive the rates on the stamped manual pages.

Our records indicate that this filing is effective 8/22/2015 for new business and 8/22/2015 for renewal business.

Please verify that these pages are the final printed manual pages intended for use with this filing and that the effective dates noted above are correct. **If we do not hear from you within the next 10 days, we will assume that you have received a stamped copy of all manual pages applicable to this filing and that the effective dates are correct.**

Sincerely,

Office of Insurance Regulation

FINANCIAL SERVICES
COMMISSION

RICK SCOTT
GOVERNOR

JEFF ATWATER
CHIEF FINANCIAL OFFICER

PAM BONDI
ATTORNEY GENERAL

ADAM PUTNAM
COMMISSIONER OF
AGRICULTURE

To: Gloria.Liu@fldfs.com Sent: 6/24/2015 1:13:08 PM
From: Gloria.Liu@fldfs.com
Cc:
Bcc:
Subject: FLOIR [RE: Company Filing Number FL1519688, FL Filing Number 15-10861]
Attachment(s) : 15-10861-Approval_Letter-USAA.rtf

The stamped documents for this filing will be sent by separate email to:
Gloria.Liu@fldfs.com

Please see the attached letter.

To: melissa.wagstaff@usaa.com Sent: 6/24/2015 1:47:45 PM
From: Gloria.Liu@fldfs.com
Cc:
Bcc:
Subject: FLOIR [RE: Company Filing Number FL1519688, FL Filing
Number 15-10861]
Attachment(s) 15-10861-Approval_Letter-USAA.rtf
:

The stamped documents for this filing will be sent by separate email to:
melissa.wagstaff@usaa.com

Please see the attached letter.

To: melissa.wagstaff@usaa.com Sent: 6/24/2015 6:06:49 PM
From: Gloria.Liu@fldfs.com
Cc:
Bcc:
Subject: FLOIR [RE: Company Filing Number FL1519688, FL Filing
Number 15-10861]
Attachment(s) : 15-10861-Approval_Letter.rtf

The stamped documents for this filing will be sent by separate email to:
melissa.wagstaff@usaa.com

Please see the attached letter.