

SERFF Tracking Number:	<i>HART-127125309</i>	State:	<i>Rhode Island</i>
Filing Company:	<i>Hartford Underwriters Insurance Company</i>	State Tracking Number:	
Company Tracking Number:	<i>FN.15.599/RWG.2011.01</i>		
TOI:	<i>19.0 Personal Auto</i>	Sub-TOI:	<i>19.0001 Private Passenger Auto (PPA)</i>
Product Name:	<i>Personal Automobile - PLIC84 Rate/Rule Revision</i>		
Project Name/Number:	<i>Private Passenger Auto/FN.15.599/RWG.2011.01</i>		

Filing at a Glance

Company: Hartford Underwriters Insurance Company

Product Name: Personal Automobile - PLIC84 SERFF Tr Num: HART-127125309 State: Rhode Island

Rate/Rule Revision

TOI: 19.0 Personal Auto

SERFF Status: Closed-(02)

State Tr Num:

Approved

Sub-TOI: 19.0001 Private Passenger Auto
(PPA)

Co Tr Num:
FN.15.599/RWG.2011.01

State Status: (08) Closed -
Approved With Review

Filing Type: Rate/Rule

Reviewer(s): Candy Casala, CIC,
Debra Stein, Ronald Make,
Augustine Park

Authors: Joyce Driscoll, Marilu
Gonzalez, David Logan, Angela
Isaac, Omayra Vega, Casey Albert

Date Submitted: 04/13/2011

Disposition Date: 09/01/2011

Effective Date Requested (New): 09/10/2011

Disposition Status: (02) Approved

Effective Date Requested (Renewal): 10/29/2011

Effective Date (New):

Effective Date (Renewal):

General Information

Project Name: Private Passenger Auto

Status of Filing in Domicile: Not Filed

Project Number: FN.15.599/RWG.2011.01

Domicile Status Comments:

Reference Organization:

Reference Number:

Reference Title:

Advisory Org. Circular:

Filing Status Changed: 09/01/2011

Deemer Date:

State Status Changed: 09/01/2011

Submitted By: Angela Isaac

Created By: Angela Isaac

Corresponding Filing Tracking Number:

Filing Description:

The attached exhibits detail the development of the overall statewide rate level indication. The information is based upon the experience of the Hartford Underwriters Insurance Company and is derived by weighting accident years 2009 and 2010.

The total proposed rate change includes all changes made to the Hartford Underwriters Insurance Company. The proposed effective date for new business policies is September 10, 2011 and for renewal policies is October 29, 2011.

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We are proposing a +9.8% base rate increase that does not vary by territory.

Company and Contact

Filing Contact Information

Angela Isaac, Personal Lines Filing Analyst angela.isaac@thehartford.com
Hartford Plaza T-1-54 888-717-1957 [Phone]
Hartford, CT 06115 860-547-5941 [FAX]

Filing Company Information

Hartford Underwriters Insurance Company CoCode: 30104 State of Domicile: Connecticut
Hartford Plaza Group Code: 91 Company Type: Property
Hartford, CT 06115 Group Name: State ID Number:
(860) 547-5000 ext. [Phone] FEIN Number: 06-1222527

Filing Fees

Fee Required? Yes
Fee Amount: \$25.00
Retaliatory? No
Fee Explanation:
Per Company: Yes

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Hartford Underwriters Insurance Company	\$25.00	04/13/2011	46533538

State Specific

This is a rate filing and I have completed the Rate Data fields on the Rate/Rule Schedule (Yes/No).: Yes

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
(02) Approved	Candy Casala, CIC	09/01/2011	09/01/2011

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Disposition

Disposition Date: 09/01/2011

Effective Date (New):

Effective Date (Renewal):

Status: (02) Approved

Comment:

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
Hartford Underwriters Insurance Company	12.900%	9.800%	\$418,391	3,809	\$4,269,292	23.100%	1.000%

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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Actuarial Support- RI Rate Procedural Informational Summary Form		Yes
Supporting Document	Uninsured Motorist Mandatory Form		Yes
Supporting Document	Statement of Compliance		Yes
Rate	Exception Pages		Yes
Rate	Rate Pages		Yes

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Rate Information

Rate data applies to filing.

Filing Method:	File and Use						
Rate Change Type:	Increase						
Overall Percentage of Last Rate Revision:	11.100%						
Effective Date of Last Rate Revision:	04/10/2010						
Filing Method of Last Filing:	File and Use						
Company Rate Information							
Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
Hartford Underwriters Insurance Company	12.900%	9.800%	\$418,391	3,809	\$4,269,292	23.100%	1.000%

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Rate/Rule Schedule

Schedule Item	Exhibit Name:	Rule # or Page	Rate Action	Previous State Filing Attachments
Status:		#:		Number:
	Exception Pages	E-14 and E-15	Replacement	Exception Pages E-14 and E-15.pdf
	Rate Pages	R-1 and R-2	Replacement	Rate Pages R-1 and R-2.pdf

**HARTFORD UNDERWRITERS INSURANCE COMPANY
PERSONAL VEHICLE MANUAL
RHODE ISLAND EXCEPTION PAGES**

14. MISCELLANEOUS COVERAGES

This rule is amended as follows:

A. Uninsured Motorists Coverage (includes Underinsured Motorists Coverage)

BODILY INJURY

1. Owners (Class Code - Refer to Statistical Plan)

This form of automobile insurance shall be afforded, on a per policy basis, at limits equal to the Bodily Injury Liability limits, under every automobile liability policy issued or delivered to the owner of a motor vehicle registered or principally garaged in the State of Rhode Island. Bodily Injury Uninsured Motorists Coverage shall apply to all vehicles insured on the policy.

EXCEPTIONS:

1. The named insured may select lower limits but may not select limits less than \$25,000/50,000 Bodily Injury Uninsured Motorists Coverage.
2. A named insured with a policy affording minimum liability coverage limits of \$25,000/50,000 Split Limit Bodily Injury Liability Coverage may reject Bodily Injury Uninsured Motorists Coverage entirely, provided that such named insured signs a notice approved by the Director of Business Regulation concerning the hazards of uninsured and underinsured motorists.
3. Subsequent renewal, reinstatement, substitute, amended, altered, modified, transfer, or replacement policies issued by the same insurer need not provide the rejected coverage or limits unless the named insured requests such coverage or increased limits in writing. However, insurers shall be required to notify the named insured as to the availability of such coverage or increased limits upon the renewal, reinstatement, substitution, amending, alteration, modification, transfer or replacement of such policy.

a. Basic Limits

Rates per policy for \$25,000/50,000 Bodily Injury Uninsured Motorists Insurance are shown on the State Rate Pages.

b. Increased Limits

Increased Limits may be afforded but may not be in excess of the Bodily Injury Liability limits on the policy.

★For higher limits of Split Limit bodily Injury Uninsured Motorists Coverage, add the following charge to the appropriate per policy rate depending on whether it is a single-car policy or a multi-car policy:

Total Limits	Additional Charge	Multi-Car Policy
\$ 50/100	\$ 23	\$ 53
100/200	29	70
100/300	41	93
250/500	56	133
500/500	74	178
500/1000	76	183

For limits not shown, use the charge for the next higher limit. For limits in excess of \$500/1000 refer to company.

HARTFORD UNDERWRITERS INSURANCE COMPANY
PERSONAL VEHICLE MANUAL
RHODE ISLAND EXCEPTION PAGES

PROPERTY DAMAGE

1. Property Damage Uninsured Motorists Coverage shall be provided at the Financial Responsibility limit under every automobile liability policy issued or delivered to the owner of a motor vehicle registered or principally garaged in the state of Rhode Island to which Collision Coverage is not provided.
2. Property Damage Uninsured Motorists Coverage need not be provided on any motor vehicle for which collision coverage is provided, unless requested by the named insured.
3. Property Damage Uninsured Motorists Coverage is subject to a \$200 deductible.

EXCEPTIONS:

- (1) The named insured has the right to reject such coverage in writing, or select higher limits, but may not select limits higher than the Split Limit Property Damage Liability Limits on the policy.
 - (2) Subsequent renewal, reinstatement, substitute, amended, altered, modified, transfer, or replacement policies issued by the same insurer need the rejected coverage or limits unless the insured requests such coverage or increased limits in writing. However, insurers shall be required to notify the named insured as to the availability of such coverage or increased limits upon the renewal, reinstatement, substitution, amending, alteration, modification, transfer, or replacement of such policy.
- a. Basic Limits
 Rates for \$25,000 Property Damage Uninsured Motorist Coverage are shown on the State Rate Pages.
 - b. Increased Limits
 Increased Limits may be provided but may not be in excess of the Property Damage Liability Limits on the policy.
- ★For higher limits of Property Damage Uninsured Motorist Coverage, add the following charge to the appropriate \$25,000 rate:

1989 and prior Sym 8 & above	1989 and Prior Sym 1-7
1990 and later Sym 3 & above	1990 and later Sym 1-2

RATE TABLE

TOTAL LIMITS	10	11	12	13	10	11	12	13
\$ 50,000	\$ 8	\$ 7	\$ 7	\$ 7	\$ 5	\$ 2	\$ 2	\$ 2
100,000	12	11	8	8	7	7	5	5

B. Underinsured Motorists Coverage

Section B. does not apply

RHODE ISLAND
Hartford Underwriters Insurance Company
Personal Automobile - Annual Rates

Territory	25/50 BI	\$25,000 PD	\$2,500 MP	2005, 2 Base	
				\$100 Ded COMP	\$200 Ded COLL
10	629	410	70	185	624
11	541	345	47	106	481
12	359	274	47	74	342
13	340	255	42	79	340

The minimum financial responsibility limits are \$25,000/\$50,000/\$25,000

**HARTFORD UNDERWRITERS INSURANCE COMPANY
PERSONAL VEHICLE MANUAL
RHODE ISLAND EXCEPTION PAGES**

14. MISCELLANEOUS COVERAGES

A. UNINSURED MOTORISTS COVERAGE

1. Owners (Class Code - Refer to Statistical Plan)

Section c. is replaced by the following:

BODILY INJURY		
Single Car Policy	Multi-Car Policy	
★Basic Limits Charge	\$49	\$115

★\$25,000 PROPERTY DAMAGE UNINSURED MOTORISTS COVERAGE

a. Cost new: 1989 and Prior Model Years Symbols 8 and above

1990 and Later Model Years Symbols 3 and above

Rate Table	Rates Per Registered Auto
10	\$ 70
11	59
12	54
13	50

b. Cost new: 1989 and Prior Model Years Symbols 1-7

1990 and Later Model Years Symbols 1-2

Rate Table	Rates Per Registered Auto
10	\$ 35
11	32
12	31
13	25

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Supporting Document Schedules

		Item Status:	Status
			Date:
Satisfied - Item:	Actuarial Support- RI Rate Procedural Informational Summary Form		

Comments:

The Rate Proedural Summary is attached.

Attachment:

Complete Rate Procedural Information Summary.pdf

		Item Status:	Status
			Date:
Bypassed - Item:	Uninsured Motorist Mandatory Form		
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status
			Date:
Satisfied - Item:	Statement of Compliance		
Comments:	The Statement of Compliance is attached.		
Attachment:	RI Statement to Compliance.pdf		

STATE OF RHODE ISLAND
RATE PROCEDURAL INFORMATIONAL SUMMARY FOR ALL NEW
AND REVISED RATE FILINGS

Insurers must provide a reply to the following interrogatories for all **new** and **revised** rate filings in accordance with the instructions provided below. While the insurer may attach/link exhibits to respective interrogatories, referring the Department to other exhibits to "find" information is not proper protocol for form completion. Further, if a question is not applicable, please so indicate and provide the basis for such position. Wherever the word "proposed rate" appears, the requirements also apply to all new or revised rate filings where applicable.

1. Provide a general description of the filing; i.e., list all factors and proposed rates or proposed changes to rates and rating factors. In doing so, include the current and proposed territory base rates for each coverage for which a rate level change is being proposed, the current and proposed territory definitions for each rating territory for which a change in definition is being proposed, and the current and proposed rating factors for each set of rating factors for which a new factor or change is being proposed.

This auto filing includes revisions to base rates only. Current and proposed rate pages have been included in the filing. No territory or rating factor changes have been made with this filing.

2. Provide the indicated rate level changes (where applicable), proposed rate level changes, and premium weights using premiums adjusted to current rate level for each coverage (e.g. bodily injury, property damage), subline (e.g. liability, physical damage), and all coverages combined.

Coverage	Indicated Rate Level Change	Proposed Rate Level Change	Weights	Proposed Rate Level Change Components*			
				Base Rate Change (a)	(b)	(c)	(d)
BI	28.3%	23.3%	36.4%	23.3%	_____	_____	_____
PD	19.8%	7.4%	24.1%	7.4%	_____	_____	_____
MP	38.8%	30.5%	2.3%	30.5%	_____	_____	_____
UM	21.8%	17.8%	9.5%	17.8%	_____	_____	_____
Comp	-30.1%	-19.6%	8.5%	-19.6%	_____	_____	_____
Coll	-9.2%	-6.0%	19.3%	-6.0%	_____	_____	_____
All Coverages							
Combined	12.9%	9.8%	100.0%	9.8%	_____	_____	_____

*Describe components of proposed change, e.g., class, increased limits, deductibles, age and symbols, territories, policy coverage, rules, etc.

3. Provide actuarially based rate level indications to support the proposed rate or proposed rate level changes by coverage. In so doing, provide the underlying data, assumptions, and derivation of each of the following components of the indications:

a) premiums adjusted to the current rate level;

Exposures are rerated at current rates using an internal rating engine.

b) premium trend;

Average policy premium is calculated by dividing earned premium at present rates by earned exposures. An exponential trend was fit to 2, 3, and 5 years of average premiums. The 5 year trend was selected for retrospective trend and the 2 year trend was selected for prospective trend.

c) losses and allocated loss adjustment expense (ALAE, which is now referred to as defense and cost containment expense) developed to an ultimate basis including the loss development triangles and the selected loss development factors;

Countrywide quarterly loss development factors are calculated to ultimate by coverage. Those factors are then applied to the latest calendar year of Rhode Island quarterly losses by coverages. The average development factor by accident year is calculated for use in the indication.

d) losses and ALAE adjusted to reflect prospective cost levels, including selected trend factors;

Frequency and Severity trends are selected separately and then combined into a loss cost trend. For each coverage, quarterly loss data is combined into rolling-annual data points for each quarter. Exponential trend are fit to between the latest 3 and 18 trend points. Selections by coverage for retrospective and prospective trends for frequency and severity are combined into a combined loss cost trend used in the indication.

e) any adjustments made for large, catastrophic, or weather related losses;

Using the ISO excess wind & water methodology, excess wind & water comprehensive losses higher than the ISO average wind & water ratio were removed. Expected wind & water losses were then added in using the ISO expected wind & water factor.

f) any adjustments made to reflect the credibility of the experience;

A credibility standard of 1084 is applied to total claims in the 2 year accident year period by coverage. For each coverage, the credibility is applied to the weighted loss ratio with a complement being the trended permissible loss ratio.

g) expense provisions – Support should include five years of expense history for each expense provision including unallocated loss adjustment expense (ULAE, which is now referred to as claim adjustment service) with an explanation if the expenses underlying the expected loss ratio or expense multiplier vary from the company's historical expenses; recognition should be given to fixed and variable expense components; and

Five years of countrywide expense history have been included in the filing for general expenses, taxes and loss adjustment expenses. While there are fixed expenses on a countrywide level, variable expense factors are used on a state level for indication purposes.

h) profit & contingency provision – Support should include rationale for the target rate of return (if applicable), and an explanation (including underlying calculations,

data, and assumptions) of how investment income was considered. Data used should be the most recent available to the company.

The Hartford's ROE model provides an estimate of the economic total rate of return to be achieved from underwriting, recognizing the tradeoff between risk and return in the various businesses. The underwriting total return is referred to as the "Benchmark ROE". Benchmark ROE provides an estimate of the ultimate profitability to be derived from underwriting activities, including credit for all investment income assuming a "minimum-risk" investment strategy.

The essential elements of the Benchmark ROE measure include: (1) a policy/accident period focus with financials estimated at ultimate value, (2) credit for investment income on cash flows at a mostly risk-free rate, (3) consideration of the time value of money via discounting, (4) assignment of the risk-based equity needed to support the writing of business over time, and (5) expression of profitability as a rate of return relative to the risk-based equity needed to support underwriting risk. Contributions from Investment via riskier investment strategies and related investment-risk equity, and from Finance via debt and capital management, are excluded. This insulates the policyholder, and rates, from the additional investment risk and potential for poor investment results (as seen in late 2008/early 2009). We feel investment risk is a shareholder risk, not a policyholder risk, and rates should not reflect that element of risk

The following variables are used in the calculation of the Benchmark ROE:

Financial variables

- premium amount and pattern of booking
- loss and loss expense amount and booking pattern
- underwriting expense amount and booking pattern

Cash flow variables

- pattern of premium collection
- pattern of loss and loss expense payment
- pattern of underwriting expense payment

Other variables

- LIBOR investment yield curve, included current swap rates for future points in time
- tax rate, including provisions for loss discounting and unearned premium offset
- surplus leverage ratios, by risk source (premium, non-catastrophe loss, catastrophe loss, expense)

Financial results within the Benchmark ROE calculation are generally expressed in terms of their net present value relative to policy/accident period inception.

Premium amount are earned premiums at present rates. Loss and loss expense amounts are the most current estimated ultimate values for the policy/accident period in question. Underwriting expense amount includes premium tax, and OUE.

Premium collection patterns vary depending on policy installments and other provisions. This can be an important factor, since investment income is lost when premium collection is delayed. The loss payment assumptions are usually based on the historical patterns identified by the reserving area, and are consistent with those that are used to estimate ultimate loss incurred.

A "mostly risk-free" LIBOR yield curve is used to determine the investment income that will be credited to underwriting. Investments are assumed in maturities that match the expected timing of net cash flows (premium collections less loss, expense and tax payments over time), with investment yield rates varying by maturity according to the yield curve.

The final components of the Benchmark ROE calculation are the leverage ratios, which establish the risk-based equity needed to support the writing of business given its historical volatility, and control risk in a uniform manner among all businesses. This risk-adjustment step, in which leverage is varied in each line of business, enables all lines to be benchmarked against the same total return standard.

Expense ratios, loss payment patterns and expense payment patterns are typically based on the entire book of business. Premium collection patterns reflect the nature of policy payment terms. An internal investment strategy group provides a monthly update of current market forward rates. Federal Income Tax rates are currently 35% applicable to both underwriting and investment, and the tax loss discount rate is updated annually.

Leverage ratios are established separately for risks related to premium, non-catastrophe loss, catastrophe loss and expense. These ratios are reviewed at least annually. The process involves an assessment of the volatility characteristics of each business in which risk and return are uniformly and jointly controlled. The leverage ratios that are assigned to each business are based on a uniform risk criterion and a target ROE level of 15%.

The Hartford has determined that a 15% return on equity over the long term is the amount needed to provide and adequate return to shareholders for the risk in the insurance business and to be able to attract additional capital when needed.

4. Provide actuarial support and any other considerations for any proposed factors or proposed changes in rating factors or class definitions; i.e., territory definitions or relativities, class plan definitions or relativities, increased limit factors, deductible factors, discounts, surcharges, etc. Actuarial support should reflect your company's experience. If credit history is utilized in the rating or underwriting process, for homeowner's insurance or personal motor vehicle insurance, the insurer must demonstrate the predictive nature of its insurance scoring process to the Department. Question 5 and 6 enumerates additional filing requirements to support the insurer's use of credit. In addition, a) all motor vehicle filings must include the information requested in Question 15, b) all filings for territory changes must be supported pursuant to Rhode Island Insurance Regulation 62 and c) all property insurance filings must include the information requested in Question 16.

If you are proposing rates, rating factors, discounts/surcharges, class/territory definitions, etc. that are based on those currently in effect in Rhode Island for another insurance company(ies) or rating organization, provide the rates, rating factors, discounts/surcharges, class/territory definitions, etc. of that other company(ies), and explain how you have considered possible differences in coverage offered, underwriting standards, claim practices, expenses, etc. between your company and the referenced company(ies).

No territory or rating factor changes have been made with this filing.

5. In order to demonstrate the predictive nature of insurance scoring, the insurer must provide an analysis that confirms the statistical correlation between insurance score and loss experience. The analysis should be performed in such a manner that adjusts for any potential distributional biases, such as among states (if multi-state data is used) with different levels of rate adequacy, or among vehicle use risk classes with different levels of rate adequacy. In addition:

a) The source of the data must be identified, e.g., number of years of data; whether the data is by accident year or policy year; whether the data is from Rhode Island or other states; if a sample of states or a sample of risks is used, a description of how the data was collected, including data verification procedures; the percentage of the overall business that is used in the sample; etc.

b) All data adjustments must be explained and supported, e.g., loss development; adjustments for the effect of large losses; how credibility was considered in the analysis; etc.

c) The data underlying the analysis must be relatively recent.

The use of insurance scoring is not changing with this filing.

6. Appropriate support for the rates/rating factors that reflect the use of insurance score should include an analysis that supports the appropriateness of each proposed rate/rating factor as opposed to any other rate/rating factor. As above, the source of the data must be identified, all data adjustments must be explained and supported, and the data underlying the analysis must be relatively recent. In addition,

a) An explanation must be provided as to how risks with insufficient or no credit history will be treated.

b) An explanation must be provided as to how risks that refuse to allow access to their credit score will be treated.

c) The company's timing and procedure for updating credit scores must be provided, e.g., at each renewal; only on the customer's request; etc.

d) The rationale behind any grouping of credit scores for rating or underwriting purposes must be provided i.e., how the beginning and end points of any ranges of insurance score were selected.

The use of insurance scoring is not changing with this filing.

7. In providing the information in (3), (4), (5) and (6) above:

a) Explain all differences from the ratemaking procedures employed in your last rate filing in Rhode Island.

Rhode Island loss cost trend factors have been used to develop trended ultimate losses for PD and Collision only. For all other coverages we are using countrywide loss cost trend factors due to the small number of claims (less than 100) in the state data.

b) Clearly describe or label the type of information used; e.g., calendar year, policy year, or accident year; basic limits or total limits; Rhode Island or countrywide; by coverage or all coverages combined; etc.

Data has been labeled in the filing.

8. Provide rationale for any proposed rate or proposed rate level change, by coverage or overall, that differs from your indicated change.

Selections differing from indicated changes were made to mitigate the impact to liability only policies.

9. Provide the derivation of the estimated overall premium effect of any proposed rate or proposed changes to a rating factor or definition. Explain how you have considered each of these effects in calculating the overall proposed rate level change.

Using an internal rating engine, a year of policies has been rated at current rate level and with proposed rates/factors. The two scenarios are compared to calculate an impact of proposed rates to the current book of business.

10. Provide any additional information that you feel may be helpful to the Department of Business Regulation in its review of this filing. For example, if the company has undergone changes in its operations that affect its expense provision, then this information should be provided.

We have provided information we believe is relevant to the filing review. Please feel free to contact us to request any additional information needed.

11. Provide the length of time the proposed rates are expected to remain in effect.

The proposed rates are expected to remain in effect for 1 year.

12. Provide a description of the risk that will receive the largest rate increase and a description of the risk that will receive the largest rate decrease as a result of the changes proposed in this filing. Include the amount of the rate change for each risk described.

The largest increase of 20.2% will be received by a married male and female, ages 55 and 52 respectively, in territory 11. The policy has two vehicles which carry liability only coverage. The impact is a result of having liability only coverage on the two vehicles.

The smallest increase of 1.0% will be received by a single female, 51 years old in territory 13. The policy has one vehicle which carries full physical damage coverage and does not have medical payments or uninsured motorist coverages. The impact is a result of having full coverage.

13. Provide an estimate of the number and percent of exposures that will receive a rate increase in excess of 15% due to the changes proposed in this filing.

We estimate that approximately 1852, or 43.2% of policies will receive an increase larger than 15%. Most these policies carry liability-only coverage.

14. Provide a statement signed by an actuary or an officer of the company to certify that the data submitted in the filing is accurate and reliable.

A signed statement of accuracy and reliability by an actuary or officer of the company has been provided.

15. For all motor vehicle filings provide a copy of the relevant pages (and cite the manual page number and rule number) from your company's rating manual that confirm that your company is in compliance with:

All relevant pages have been attached after the rate procedural information pages.

a) RI Gen. Laws §27-9-53 & Insurance Regulation 25 (8), Motor Vehicle Insurance Rate Increases Relating to Violations and Accidents.

Policies relating to RI Gen. Laws §27-9-53 & Insurance Regulation 25 (8) will be written with respect to Hartford Underwriters Insurance company Rule 5 (pages E9 through E12). It is The Hartford's intention to be in full compliance with this law and regulation regarding increases relating to violations and accidents.

b) RI Gen. Laws §27-9-4, Consideration in Making of Rates: (4)(a)(1)(i), (4)(d), (4)(e), and Section 45-19-17, Operation of Emergency Vehicles – Accidents.

Policies relating to RI Gen. Laws §27-9-4 will be written with respect to Hartford Underwriters Insurance company Rule 5 – exceptions 2.j (Page E10). It is The Hartford’s intention to be in full compliance with this law and regulation regarding increases relating to emergency vehicles.

c) RI Gen. Laws §27-29-13, Payment of Premium – Cancellation

Policies relating to RI Gen. Laws §27-29-13 will be cancelled with respect to Hartford Underwriters Insurance company Rule 10 (Page E12). It is The Hartford’s intention to be in full compliance with this law and regulation regarding cancellation of customer policies.

d) Insurance Regulation 25(5)&(6), Additive and Reductive Amounts for Policy Credits, Regulation 25(7), Chargeable Accident

Policies relating to RI Gen. Laws 25(5)&(6) will be written with respect to Hartford Underwriters Insurance Company Rule 5 - accidents (Page E9). It is The Hartford’s intention to be in full compliance with this law and regulation regarding increases relating to violations and accidents.

e) RI Gen. Laws §27-9-7.1, Premium Reduction for Completing a Motor Vehicle Accident Prevention Course

Policies relating to RI Gen. Laws 27-9-7.1 will be written with respect to Hartford Underwriters Insurance company Rule 4 – 10. defensive driver (Page E8). It is The Hartford’s intention to be in full compliance with this law and regulation regarding accident prevention courses.

f) RI Gen. Laws §27-9-7.2, Premium Reduction for Anti-theft Devices, and Regulation 84

Policies relating to RI Gen. Laws 27-9-7.2 and Reg 84 will be written with respect to Hartford Underwriters Insurance company Rule 4 – 7. safety equipment discounts (Page E7). It is The Hartford’s intention to be in full compliance with this law and regulation regarding anti-theft devices.

g) RI Gen. Laws §27-9-56, Use of Credit Rating

The Hartford’s custom credit model was filed and approved in filing number FN.19.999.CCM, filed on April 2, 2003 and approved on May 6, 2003, for use in Hartford Underwriters Insurance company see Rule 4 – 13. advantage discount (Page E9). It is The Hartford’s intention to be in full compliance with this law and regulation regarding use of credit rating.

h) Insurance Regulation 98, Rhode Island Automobile Insurance Plan

Losses and assessments resulting from The Hartford’s participation in the Rhode Island Automobile Insurance Plan are not included in this rate indication.

16. For all property insurance filings provide a copy of the relevant pages (and cite the manual page number and rule number) from your company’s rating manual that confirm that your company is in compliance with:

a) RI Gen. Laws §27-6-53, and Bulletin 2002-16, Use of Credit

- b) RI Gen. Laws §27-29-4.3, Refusal to Issue or Increased Premium Due to Nonoccupancy.**
- c) RI Gen. Laws §27-29-4(7) (i,ii,iii), Unfair Competition and Practices, and Insurance Bulletin #2003-9 “Underwriting Restriction Based on Age/Location of Property”.**
- d) RI Gen. Laws §27-5-3.7 and Insurance Regulation 110, Hurricane Deductibles, triggers and Policyholder Notices**

This section is not applicable for personal auto filings

17. For all Title Insurance Filings, insurers must confirm that it offers a reduced mortgage refinance rate based upon actuarially supported rates, filed and approved for use in RI.

This section is not applicable for personal auto filings.

as of 4/21/2008

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- (iii) Other remaining unassigned Youthful Operators to other remaining cars in the order of the operator having highest Primary Rating factor to the car having the latest Model Year. If two cars have the same Model Year, assign operator to the car having the highest symbol.

Exception to ii and iii

If the rating factor of the Youthful Operator is less than the rating factor of the Non-Youthful Operator, the Non-Youthful Operator classification shall apply.

- (iv) Any remaining cars at the appropriate No Youthful Operator classification.

Rule C.6. is replaced by the following:

6. Vehicles Equipped With Anti-Theft Devices

Discounts on Comprehensive Coverage shall be afforded on vehicles equipped with the anti-theft devices defined in paragraph c. below.

Refer to Company for required evidence of installation of anti-theft devices meeting the following criteria prior to granting a discount.

- a. The anti-theft discounts are:

Device Category	Anti-Theft Device	Discount
1.	Alarm Only	5%
2.	Active Disabling Devices	5%
3.	Passive Disabling Devices	15%
4.	Vehicle Recovery Systems Devices	25%

- b. If a vehicle is equipped with more than one anti-theft device, the amount of the discount shall be as follows:

Device Category	Multiple Anti-Theft Devices	Discount
5.	Category 4 and Category 1	30%
6.	Category 4 and Category 2	30%
7.	Category 4 and Category 3	35%

c. Definitions of Anti-Theft Devices

- (1) "Alarm Only Device" means a device which sounds an audible alarm that can be heard at a distance of at least 300 feet for a minimum of three minutes.
- (2) "Active Disabling Device" means a device which disables the vehicle by making the fuel, ignition or starting system inoperative. A disabling device is categorized as active if a separate manual step IS required to engage the device.
- (3) "Passive Disabling Device" means a device which disables the vehicle by making the fuel, ignition or starting system inoperative. A disabling device is categorized as passive if a separate manual step is NOT required to engage the device.
- (4) "Vehicle Recovery System Device" means an electronic unit installed in a vehicle that is activated after the vehicle is stolen. When activated, the device provides information to law enforcement officials or to another public or private entity regarding the vehicle's location. The vehicle recovery system provides for the routing delivery of the information to the appropriate law enforcement entity to assist in the recovery of the vehicle.

Rule C.7. is replaced by the following:

★7. Safety Equipment Discounts

a. Passive Restraint Discounts

The following discounts apply to Medical Payments and/or any No Fault Coverage only. To qualify, the private passenger auto must be equipped with a factory installed automatic occupant restraint, conforming to the federal crash protection requirements, and meeting criteria described below:

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- ★(1) 10% discount shall be afforded when an airbag is installed in the driver-side-only position.
- ★(2) 20% discount shall be afforded when airbags are installed in both front outboard seat positions.

b. Anti-Lock Braking System Discount

A 3% discount for Bodily Injury, Property Damage Liability and Collision coverages shall be afforded for those private passenger autos equipped with a factory installed Anti-Lock Braking System (ABS).

8. Pickups and Vans

Paragraph c. is replaced by the following:

- c. When a pickup is used to transport a non-permanently attached camper body, or to transport a camper body with no facilities for cooking and sleeping:
 - (1) Add the cost of the camper body to the cost of the pickup and determine a symbol from the tables on page 1 of the symbol and identification section.
 - (2) Rate according to Paragraph a.

Paragraphs d. is added:

- d. When a pickup is used to transport a permanently attached camper body with facilities for cooking and sleeping, refer to the Motor Homes Section of the Miscellaneous Types Rule. The following definitions are added to Section C:

9. Reserved for Future Use

10. Defensive Driver

A 10% Defensive Driver Discount shall be applied to the premiums for all class rated coverages on the vehicle provided:

- 1. The vehicle is classified as a private passenger auto; and
- 2. The principal operator of the vehicle has a completion certificate dated within the most recent 36 months, certifying that he or she has both successfully and voluntarily completed any recognized Defensive Driver Course.

The discount shall apply:

- 1. Only to the auto principally operated by the insured with the course completion certificate.
- 2. Only once to each such auto regardless of the number of operators with course completion certificates.
- 3. For purpose of this rule, a private passenger auto shall include a motor home.

Note: Refer to the Primary Classification pages for statistical coding. This information will only be used for statistical reporting purposes.

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11. Account Credit

The Account Credit driving record sub-classification is applicable to those policyholders having a homeowner policy in effect in the AARP Homeowners Insurance Program.

12. Renewal Credit

The Renewal Credit driving record sub-classification applies to those policyholders who:

- (1) completed three through five consecutive years of Point-free experience with the Hartford Underwriters Insurance Company; or
- (2) completed six or more consecutive years of Point-free experience with the Hartford Underwriters Insurance Company.

13. Advantage Discount

A 10% discount for all class rated coverages shall be afforded for all vehicles on a policy qualifying for the Advantage discount. To qualify for the credit:

1. The application must be for new business*; and
2. The applicant must qualify for the Lifetime Continuation Agreement; and
3. The named insured(s) must have a Superior Insurance Risk Score.

*The named insured(s) who originally qualify for the Advantage Discount will continue to receive the Advantage Discount on subsequent renewals.

5. SAFE DRIVER INSURANCE PLAN (SDIP)

Section B.1.a. Convictions

Paragraphs (2) and (3) do not apply.

The following is added to Section B.1.a.:

Note: No points are assigned for conviction of a moving violation other than those violations listed in Rule 5.B.1.a.

Paragraph B.1.b. is replaced by the following:

b. Accidents

Points shall be assigned for each chargeable auto accident meeting the criteria described in (1) or (2) below, if the accident involved the applicant or any current resident operator, while operating an auto. A chargeable accident is an accident in which the operator of the vehicle is determined to be more than 50% at fault.

- (1) One point is assigned for each chargeable auto accident that occurred during the experience period and which resulted in bodily injury or death; or
- ★(2) One point is assigned for each chargeable auto accident for which an insurer paid a claim during the experience period for damage to any property, including the insured's, of \$1,000 or more.

Exceptions:

1. No points are assigned for accidents incurred by an operator demonstrated to be a named insured or a principal operator of an auto insured under a separate policy.

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2. No points are assigned for accidents occurring under the following circumstances:
 - a. Auto lawfully parked (if the parked vehicle rolls from the parked position then any such accident is charged to the person who parked the auto).
 - ★b. The applicant, owner or other resident operator involved in an accident (a) is reimbursed for 50% or more of his or her damages by, or on behalf of, the other driver or drivers involved in the accident, or (b) has received a judgment in a court of law against the other owner or operator involved in the accident for 50% or more of the loss incurred.

In addition, no Uninsured Motorists coverage claim made against any insurer by any insured covered by the policy shall be considered for the purpose of assigning driving record points.
 - c. There has been a determination by a law enforcement agency that the damage inflicted on the owned or operated vehicle was done by an individual operating a stolen vehicle whether or not that individual was apprehended.
 - d. The operator or owner of the other vehicle involved in the automobile accident has had his or her license and/or registration suspended by action of the Registry of Motor Vehicles for failing to satisfy financial responsibility requirements.
 - e. Auto is struck in the rear by another vehicle and the applicant or resident operator has not been convicted of a moving traffic violation in connection with this accident.
 - f. Operator of the other auto involved in the accident was convicted of a moving traffic violation and the applicant or resident operator was not convicted of a moving traffic violation in connection with the accident.
 - g. Auto operated by the applicant or resident operator is struck by a "hit-and-run" vehicle, if the accident is reported to the proper authority within 24 hours or as soon as possible by the applicant or resident operator.
 - h. Accidents involving damage by contact with animals or fowl.
 - i. Accidents involving Physical Damage, limited to and caused by flying gravel, missiles, or falling objects.
 - j. accidents occurring when using an auto in response to an emergency if the operator of the auto at the time of accident was a paid or volunteer member of any Fire Department or First Aid Squad. This exception does not include an accident occurring after the auto ceases to be used in response to such emergency.

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- k. For any loss or incident if the applicant or resident operator was a law enforcement officer and such loss or incident occurred while in the course of his or her employment for a state, city or town police department.
- l. For any loss or incident if the applicant or resident operator was a commercial vehicle driver and such loss or incident occurred while in the course of his or her employment. For the purpose of this rule, a commercial vehicle shall be a motor vehicle in excess of ten thousand (10,000) pounds or a motor vehicle used for public livery.
- m. For any loss or incident if the applicant or resident operator was a bus driver and such loss or incident occurred while in the course of his or her employment for the Rhode Island public transit authority or a private or municipal school bus company.

Section B.1.c. Inexperienced Principal Operator

This section does not apply.

Section B.2. is replaced by the following:

***2. Experience Period**

The experience period shall be the three years immediately preceding the effective date of a new or renewal policy.

Section C. Driving Record Sub-Classification

Paragraph C., Driving Record Sub-Classification, is replaced by the following:

The Driving Record Sub-Classification shall be determined from the number of Driving Record Points accumulated during the experience period. Use the table below to convert the Driving Record Sub-Classification to the Driving Record Surcharge. The Driving Record Surcharge is to be added to the premium for each of the following coverages that may apply to the auto:

Bodily Injury Liability

Property Damage Liability

Comprehensive

Collision

Driving Record Surcharges are not subject to modification by Primary or Secondary classification rating factors, Increased Limit Factors, physical Damage deductible factors or any other modification.

Number of Driving Record Points	Driving Record Sub-Classification	Code	Single Car Risk	Multi-Car Risk
0	0	0	\$0	\$0
1	1	1	28	14
2	2	2	66	33
3	3	3	110	55
4 or more	4	4	154	77

NOTE: Driving Record Sub-Classification 1 is permitted for a policyholder having Renewal Credit if the accident occurred after completion of three or more years of chargeable accident and conviction free experience. Refer to Secondary Table II for the applicable surcharge and rating code.

Section D.2. is replaced by the following:

Section D.2. Three or more car risk

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2. Any points developed under SDIP are assigned to the two cars having the latest Model Year. If two or more cars have the same Model year, assign points to the cars having the highest symbol.

Section II

Section II does not apply

7. MINIMUM PREMIUM RULE

- D. The minimum annual premium charge is \$10.

9. CHANGES

- C.2. The "Minimal Premium" is \$2.00.

10. CANCELLATION

The following Exceptions are added to Section A:

Exceptions

Compute return premium on a pro rata basis in the following cases:

7. If a policy financed under the terms of an insurance premium financing agreement is canceled by the finance company upon default of the insured.
8. If requested by a legal representative of the deceased named insured.

★12. RULES FOR DETERMINING PHYSICAL DAMAGE RATES

- A. Other Than Collision - All model years

The Comprehensive rates for all model years and symbols shall be determined as follows:

1. Refer to page MYSR-1 to determine the applicable Model Year and Symbol Relativity and to the rate pages for the comprehensive base rate for the selected territory;
2. Multiply the territory base rate by the Model Year/Symbol relativity ; round to whole dollar.

Exceptions:

1990 and Subsequent Model Years

Rates for Symbol 27 shall be determined as follows:

- a. Increase the Symbol 26 relativity for the Base Model Year by +1.50 for each \$10,000 or fraction of \$10,000 above \$80,000 Original Cost; and
- b. Multiply the relativity determined in a. by the Symbol 2 relativity for the applicable model year; round to two positions;
- c. Multiply the comprehensive base rate for the selected territory by the Model Year Symbol relativity determined in a. and b.; round to whole dollar.

**RHODE ISLAND
STATEMENT OF COMPLIANCE**

I, Bill Oostendorp, acting as a duly authorized
representative of The Hartford state that
the enclosed filing, FN.15.599/RWG.2011.01, has been
reviewed and, to the best of my knowledge and belief,
is in compliance with all applicable Rhode Island laws and
regulations now in effect.


Company Representative Signature
AVP and Actuary, Personal Lines Pricing
Title
4/11/11
Date

COMPANIES

- Hartford Fire Insurance Co.
- Hartford Accident & Indemnity Co.
- Hartford Casualty Ins. Co.
- Hartford Underwriters Ins. Co.
- Twin City Fire Ins. Co.
- Hartford Ins. Co. of the Midwest
- Trumbull Ins. Co.
- Property & Casualty Ins. Co. of Hartford