

State: Rhode Island **Filing Company:** United Property & Casualty Insurance Co
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: Rhode Island Homeowners Program
Project Name/Number: UPC - RI HO - Watercraft Liability/UPC - 003-01

Filing at a Glance

Company: United Property & Casualty Insurance Co
Product Name: Rhode Island Homeowners Program
State: Rhode Island
TOI: 04.0 Homeowners
Sub-TOI: 04.0000 Homeowners Sub-TOI Combinations
Filing Type: Form/Rate/Rule
Date Submitted: 06/28/2012
SERFF Tr Num: UPCI-128521718
SERFF Status: Closed-(02) Approved
State Tr Num:
State Status: (08) Closed - Approved With Review
Co Tr Num: UPC - 003 - 01- WATERCRAFT LIABILITY

Effective Date 10/01/2012
Requested (New):
Effective Date 10/01/2012
Requested (Renewal):
Author(s): Rob Oberkonz
Reviewer(s): Candy Casala, CIC (primary), Sandra West
Disposition Date: 07/03/2012
Disposition Status: (02) Approved
Effective Date (New):
Effective Date (Renewal):

State: Rhode Island **Filing Company:** United Property & Casualty Insurance Co
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
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General Information

Project Name: UPC - RI HO - Watercraft Liability Status of Filing in Domicile: Authorized
 Project Number: UPC - 003-01 Domicile Status Comments:
 Reference Organization: ISO Reference Number: H-2000-000FR
 Reference Title: Advisory Org. Circular:
 Filing Status Changed: 07/03/2012
 State Status Changed: 07/03/2012 Deemer Date:
 Created By: Rob Oberkonz Submitted By: Rob Oberkonz
 Corresponding Filing Tracking Number:

Filing Description:

Adoption of the ISO "Outboard Motors and Watercraft" Rule and Form. In additional, a "Me Too" of Narragansett Bay Insurance Company's "Outboard Motors and Watercraft" Rates.

Company and Contact

Filing Contact Information

Robert Oberkonz, Product Manager roberkonz@upcic.com
 360 Central Ave, Suite 900 727-895-7737 [Phone] 111 [Ext]
 St. Petersburg, FL 33701 727-895-8623 [FAX]

Filing Company Information

United Property & Casualty Insurance Co CoCode: 10969 State of Domicile: Florida
 360 Central Ave Group Code: Company Type: P & C
 Ste 900 Group Name: State ID Number:
 St. Petersburg, FL 33701 FEIN Number: 59-3560143
 (727) 895-7737 ext. [Phone]

Filing Fees

Fee Required? Yes
 Fee Amount: \$40.00
 Retaliatory? No
 Fee Explanation: One new form "HO-24-75".
 Per Company: Yes

Company	Amount	Date Processed	Transaction #
United Property & Casualty Insurance Co	\$40.00	06/28/2012	60541275

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	07/03/2012	07/03/2012

State: Rhode Island **Filing Company:** United Property & Casualty Insurance Co
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: Rhode Island Homeowners Program
Project Name/Number: UPC - RI HO - Watercraft Liability/UPC - 003-01

Disposition

Disposition Date: 07/03/2012

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 req'd):	Minimum % Change (where req'd):
United Property & Casualty Insurance Co	0.000%	0.000%	\$0	0	\$0	0.000%	0.000%

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Actuarial Support- RI Rate Procedural Informational Summary Form required for all New (including startups) and revisions to existing rates		Yes
Supporting Document	Statement that the Data is Accurate and Reliable		Yes
Rate	Outboard Motors and Watercraft		Yes

SERFF Tracking #:

UPCI-128521718

State Tracking #:

Company Tracking #:

UPC - 003 - 01- WATERCRAFT LIABILITY

State: Rhode Island **Filing Company:** United Property & Casualty Insurance Co
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: Rhode Island Homeowners Program
Project Name/Number: UPC - RI HO - Watercraft Liability/UPC - 003-01

Rate Information

Rate data applies to filing.

Filing Method: SERFF
Rate Change Type: Neutral
Overall Percentage of Last Rate Revision: 0.000%
Effective Date of Last Rate Revision:
Filing Method of Last Filing: SERFF

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 req'd):	Minimum % Change (where req'd):
United Property & Casualty Insurance Co	0.000%	0.000%	\$0	0	\$0	0.000%	0.000%

SERFF Tracking #:

UPCI-128521718

State Tracking #:**Company Tracking #:**

UPC - 003 - 01- WATERCRAFT LIABILITY

State:

Rhode Island

Filing Company:

United Property & Casualty Insurance Co

TOI/Sub-TOI:

04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations

Product Name:

Rhode Island Homeowners Program

Project Name/Number:

UPC - RI HO - Watercraft Liability/UPC - 003-01

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		Outboard Motors and Watercraft	830	New		RI HO Manual - Rule 612. Outboard Motors and Watercraft - 06.19.12.pdf

United Property & Casualty Insurance Company
RHODE ISLAND HOMEOWNERS MANUAL

830. Outboard Motors and Watercraft

A. Introduction

Coverage is included in the policy form, at no additional charge, for certain watercraft powered by an outboard engine or motor or combination of outboard engines or motors of up to 25 horsepower, and sailboats less than 26 feet in overall length with or without auxiliary power. Coverage is also included for watercraft powered by inboard or inboard-outdrive engines or motors, including those that power a water jet pump, of 50 horse power or less when not owned by an insured or more than 50 horse power when not owned by or rented to an insured.

B. Coverage Description

1. The policy may be endorsed to provide coverage for the following types of craft:
 - a. Watercraft, up to 26 feet in length powered by outboard engines or motors exceeding 25 horsepower; or powered by inboard or inboard-outdrive engines or motors, including those that power a water jet pump.
 Accumulate total horsepower if two or more engines or motors are regularly used together with any single watercraft owned by insured.
 - b. Sailboats 26 feet or more in overall length, with or without auxiliary power.
2. Coverage must be written to expiration of the policy. It is permissible, however, to stipulate for all watercraft eligible in this rule, the navigational period of each year. Premium shall be adjusted on a pro rata basis.
3. For watercraft not described in preceding Paragraphs **A.** and **B.1.**, coverage is not permitted under the Homeowners Policy.
4. The premium in the state where the Insured's residence premises is located shall apply. However, if the insured owns another residence premises in a different state and principally operates the watercraft from that residence, apply the premium for that state.

C. Premium

1. Outboard, Inboard, or Inboard-Outdrive Engines or motors

		Length	
		Up to 15 feet	Over 15 to 26 feet
Horsepower	Rate		
Up to 50*	\$ 8.00	\$12.00	
51 to 100	\$14.00	\$18.00	
101 to 150	\$19.00	\$23.00	
151 to 200	N/A	\$29.00	
Over 200	N/A	N/A	

2. Sailboats With or Without Auxiliary Power

Overall Length/Feet	Rate
26 to 40 feet*	\$8.00
Over 40 feet	N/A

* Outboard engines or motors of up to 25 horsepower or sailboats less than 26 feet in overall length with or without auxiliary power are covered in the policy form.

D. Endorsement

Use Watercraft Endorsement **HO 24 75.**

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UPC - 003 - 01- WATERCRAFT LIABILITY

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TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations

Product Name: Rhode Island Homeowners Program

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Supporting Document Schedules

		Item Status:	Status Date:
Satisfied - Item:	Actuarial Support- RI Rate Procedural Informational Summary Form required for all New (including startups) and revisions to existing rates		
Comments:	Attached...		
Attachment(s):			
State of Rhode Island Rate Procedural Informational Summary Resposes - 06.28.12.pdf			

		Item Status:	Status Date:
Satisfied - Item:	Statement that the Data is Accurate and Reliable		
Comments:	Required by number 14. of the Rate Procedural Information Form.		
Attachment(s):			
Statement that the Data is Accurate and Reliable - 06.28.12.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. *In the development of this coverage, we have reviewed the rates and rules of a number of major competitors, especially those we understand are currently actively writing new personal lines property policies along the Rhode Island coast. For the "Outboard Motors and Watercraft" the proposed rates have been developed based upon those of Narragansett Bay Insurance Company (NBIC). United is requesting to adopt the ISO Rule and Form for this coverage.*

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. *Not Applicable; just adopting ISO's Outboard Motors and Watercraft Rule and Form.*

Coverage	Indicated Rate Level Change	Proposed Rate Level Change	Weights	Proposed Rate Level Change Components*			
				Base Rate Change			
				(a)	(b)	(c)	(d)
N/A	0%	0%	0%	0%	0%	0%	0%
N/A	0%	0%	0%	0%	0%	0%	0%
N/A	0%	0%	0%	0%	0%	0%	0%
N/A	0%	0%	0%	0%	0%	0%	0%
N/A	0%	0%	0%	0%	0%	0%	0%
All Coverages Combined	0%	0%	0%	0%	0%	0%	0%

*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:

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

- a) premiums adjusted to the current rate level; *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*
- b) premium trend; *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*
- 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; *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*
- d) losses and ALAE adjusted to reflect prospective cost levels, including selected trend factors; *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*
- e) any adjustments made for large, catastrophic, or weather related losses; *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*
- f) any adjustments made to reflect the credibility of the experience; *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*
- 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 *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*
- 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. *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*

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

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).

United has elected to adopt the Outboard Motors and Watercraft rates from Narragansett Bay Insurance Company:

C.Premium

1. Outboard, Inboard, or Inboard-Outdrive Engines or motors

<i>feet</i>	<i>Length</i>	
	<i>Up to 15 feet</i>	<i>Over 15 to 26</i>
<i>Horsepower</i>	<i>Rate</i>	<i>Rate</i>
<i>Up to 50*</i>	<i>\$ 8.00</i>	<i>\$12.00</i>
<i>51 to 100</i>	<i>\$14.00</i>	<i>\$18.00</i>
<i>101 to 150</i>	<i>\$19.00</i>	<i>\$23.00</i>
<i>151 to 200</i>	<i>N/A</i>	<i>\$29.00</i>
<i>Over 200</i>	<i>N/A</i>	<i>N/A</i>

2. Sailboats With or Without Auxiliary Power

<i>Overall Length/Feet</i>	<i>Rate</i>
<i>26 to 40 feet*</i>	<i>\$8.00</i>
<i>Over 40 feet</i>	<i>N/A</i>

United is adopting ISO’s Outboard Motors and Watercraft Rule and their form [HO 24 75]. United reviewed other carries’ Rate/Rule/Form for this coverage, but it was decided to “Me Too” Narragansett Bay Insurance Company as that is the carrier we used as our benchmark for our original filing.

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

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.

There is no change in United's Insurance Scoring with this filing; United is just adopting ISO's Outboard Motors and Watercraft Rule and Form, and doing a "Me Too" of the Narragansett Bay Insurance Company's Outboard Motors and Watercraft Rates.

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. *United P&C does not use Insurance Score Rate/Rating Factors; the only use of Insurance Score is to determine eligibility and/or an underwriter review. United P&C uses a cut off insurance score of "600", and any risk with an insurance score of less than 600 goes through an underwriting review. In no instance, whether when reviewing new business or renewals, will the credit score be the sole basis of determining an individual's acceptability.*

In addition,

- a) An explanation must be provided as to how risks with insufficient or no credit history will be treated. *Any risk with insufficient or no credit history will NOT be referred as if it had an insurance score of less than 600; the risk will go through the review process as if the insurance score was above 600.*
- b) An explanation must be provided as to how risks that refuse to allow access to their credit score will be treated. *In order to complete an application, the consumer must agree to allow United P&C to run their credit score in order to move forward in the application process.*
- 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. *United P&C only orders credit scores on new business.*

STATE OF RHODE ISLAND
RATE PROCEDURAL INFORMATIONAL SUMMARY FOR ALL NEW
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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. *United P&C does not use insurance scores for rating; just for underwriting. The score used is below 600 and even then the risk just goes through an underwriting review. The score selected is “under 600” and this bucket of insurance scores statistically have the worst loss ratio relativities. Also, no risk is cancelled or decline strictly due to credit score.*

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. *Not Applicable; Initial Filing*

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. *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*

8. Provide rationale for any proposed rate or proposed rate level change, by coverage or overall, that differs from your indicated change. *Not Applicable; United is filing a “Me Too” of Narragansett Bay Insurance Company’s “Outboard Motors and Watercraft” rates.*

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. *Not Applicable; this is a new coverage offering.*

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. *United P&C Insurance Company is a new entry into the State of Rhode Island looking to write coastal business as we do in Florida, South Carolina, and Massachusetts.*

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 one 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. *Not Applicable; this is a new coverage offering.*

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. *Not Applicable; this is a new coverage offering.*

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. *Attached.*

STATE OF RHODE ISLAND
RATE PROCEDURAL INFORMATIONAL SUMMARY FOR ALL NEW
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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: *Not Applicable.*

- a) RI Gen. Laws §27-9-53 & Insurance Regulation 25 (8), Motor Vehicle Insurance Rate Increases Relating to Violations and Accidents. *Not Applicable.*
- 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. *Not Applicable.*
- c) RI Gen. Laws §27-29-13, Payment of Premium – Cancellation *Not Applicable.*
- d) Insurance Regulation 25(5)&(6), Additive and Reductive Amounts for Policy Credits, Regulation 25(7), Chargeable Accident *Not Applicable.*
- e) RI Gen. Laws §27-9-7.1, Premium Reduction for Completing a Motor Vehicle Accident Prevention Course *Not Applicable.*
- f) RI Gen. Laws §27-9-7.2, Premium Reduction for Anti-theft Devices, and Regulation 84 *Not Applicable.*
- g) RI Gen. Laws §27-9-56, Use of Credit Rating *Not Applicable.*
- h) Insurance Regulation 98, Rhode Island Automobile Insurance Plan *Not Applicable.*

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 *United P&C complies with Rhode Island Gen. Laws §27-6-53, and Bulletin 2002-16*
- b) RI Gen. Laws §27-29-4.3, Refusal to Issue or Increased Premium Due to Nonoccupancy. *United P&C would not refuse to issue or charge an increased premium for an occupied dwelling solely because of the fact that building has formerly been unoccupied or vacant.*
- 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”. *United P&C does not refuse to issue, refuse to renew, cancel or limit the amount of insurance coverage on a property or casualty risk because of the geographic location of the risk.*
- d) RI Gen. Laws §27-5-3.7 and Insurance Regulation 110, Hurricane Deductibles, triggers and Policyholder Notices – *United P&C caps our increased hurricane percentage deductibles at 5% per the regulation and provides a clear explanation of the amount of the deductible that will apply [AOP & Hurricane]. We will also attach the ISO informational “IL P 043 Important Notice” that provides the two required examples of deductibles a long with the ISO Hurricane Deductible*

STATE OF RHODE ISLAND
RATE PROCEDURAL INFORMATIONAL SUMMARY FOR ALL NEW
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Endorsement "HO 03 57" that details the hurricane deductible trigger. Our Deductible Rule can be found in our Rhode Island Homeowners Manual on page 440-1 [Rule 440].

e) RI Gen. Laws §27-6-8.2 requires all insurers to include a credit or discount in premiums for commercial property insureds that install and maintain fire prevention and suppression equipment and use of fire resistant building material. *Not Applicable as United P&C will not be writing "commercial property" at this time.*

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. *Not Applicable.*

UPC INSURANCE

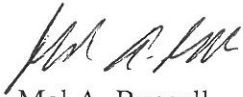

Trusted Choice®
A Trusted Choice® Partner Company

June 28, 2012

RE: Company Filing UPC-003-01-Watercraft Liability
SERFF Tracking Number: UPCI-128521718
Homeowners Multi-Peril – Adoption of ISO's Outboard Motors and Watercraft Liability

As required by Item 14 on the Rate Procedural Information Form, I hereby certify that the data submitted in the above captioned filing is accurate and reliable.

Sincerely,



Mel A. Russell
President