

Conning Report
Frequently Asked Questions
September 2016

1. Why did NAPSLO undertake this analysis?

The NAPSLO Board of Directors and its members felt that there is a long-held misconception among retail agents and brokers, insureds and others in the insurance industry that the wholesale distribution channel is substantially more expensive than the retail channel in the placing of specialty risks.

NAPSLO retained Conning, Inc. to assist in developing an objective analysis of the cost of wholesale distribution versus the cost of retail distribution to allow for a better understanding of the facts regarding the cost structure and ratios between the channels.

2. How were the retail and wholesale composite groups developed?

NAPSLO and Conning developed a detailed and thorough process to identify two separate composite groups of insurance companies as a proxy for each mode of insurance distribution for selected commercial lines. Insurers that use wholesale brokers as their predominant distribution compose the "Wholesale Composite," and insurers that use retail brokers as their predominant distribution compose the "Retail Composite."

To separate eligible companies into either the Wholesale or Retail Composite, Conning initially used A.M. Best Company's distribution identification tag. More important, NAPSLO then provided substantial input through a company-by-company review based on its collective knowledge of commercial insurance distribution channels. To conduct this detailed review, NAPSLO appointed a subcommittee of eight current and former members of the NAPSLO Board of Directors. This subcommittee was charged with determining whether an individual insurer distributed a predominance (i.e., 2/3 or more) of its business through the wholesale or the retail channel. If the subcommittee determined that a carrier did not have at least 2/3 of its distribution through either wholesale or retail agents and brokers, the carrier was excluded from either composite.

To compile the individual lines of business to be analyzed, the composites included only those insurers that had at least 70% of total direct written premium in commercial property and casualty lines of business. A total of ten individual commercial lines were selected to be included in the analysis. Further, only those companies with an aggregate of at least 70% of direct written premium within these select commercial lines were included in the composites. The selected Commercial Lines were:

- Allied Lines
- Commercial Automobile
- Commercial Multiperil
- Earthquake
- Fire
- Inland Marine
- Medical Professional Liability
- Ocean Marine
- Other Liability
- Products Liability

3. How many companies are in each composite, and how much premium do these companies represent?

From the 3,061 individual company universe, a total of 349 eligible insurance companies were placed in the Wholesale Composite or the Retail Composite. The Wholesale Composite was composed of 83 companies with aggregate direct written premium of \$19.1 billion. The Retail Composite was composed of 266 companies with aggregate direct written premium of \$60.6 billion.

Listings of companies included in the Retail and Wholesale Composites are included as **Exhibit I** and **Exhibit II**.

4. Were any companies excluded from the analysis?

Yes, a number of companies were excluded from the analysis in order to appropriately compare the costs of commercial P&C distribution. From the universe of 3,061 individual insurance companies, Conning excluded those companies that did not write a majority (i.e., 70% or more) of their direct written premium in commercial P&C lines and had less than 70% of their premium in the ten selected lines. Additional insurance companies were excluded as well, and reasons for their exclusion, are as follows:

Companies Excluded from the 3,061 Company Universe

Number of Companies Excluded	Reason for Exclusion
1,605	Companies with less than 70% of DWP in commercial lines
157	Companies with non-select lines of business
227	Workers' compensation & excess workers' compensation insurers (greater than 50% DWP in this line)
206	Risk retention groups
127	Insurers employing direct response distribution as their predominant or exclusive distribution
59	Monoline surety writers (greater than 50% DWP in this line)
25	Insurers with zero or negative DWP
20	Workers' compensation state funds and other state facilities
18	Mortgage guaranty insurers (greater than 50% DWP in this line)
13	Financial guaranty insurers (greater than 50% DWP in this line)
14	Crop insurers (greater than 50% DWP in this line)
11	Insurers with outlier expense ratios (above 100% or less than 5%)
6	Captive insurers
4	Companies in liquidation or run-off
3	Two student travel & accident insurers and one trade credit insurer
2,495	Total companies excluded prior to NAPSLO's review

As described in question number 2 above, insurers with less than 2/3 of their distribution through either wholesale or retail channels, based on NAPSLO’s review, were excluded from the analysis and reduced Conning’s initial composites from 566 companies to the 349 eligible insurance companies ultimately included in the Wholesale or the Retail Composites.

5. Did company size affect the non-loss cost comparison?

No, the elimination of the smallest companies did not materially affect the results of the non-loss cost comparison. Excluding companies with less than \$10 million in premiums lowered the median expense ratio slightly from the 31.1% and 32.1% presented in Conning’s report to 30.9% and 31.8% for the Wholesale Composite and Retail Composite, respectively. The favorable 1.0 point variance in the cost ratio for the Wholesale Composite as presented in Conning’s report would decrease slightly to a favorable 0.9 point variance when excluding the smallest companies.

6. What was the data source used in the development of the analysis of non-loss costs?

Conning analyzed statutory insurance company filing data as provided by A.M. Best.

7. Did the period of time chosen (2010-2015) affect the non-loss comparison?

No, the period chosen did not affect the non-loss cost comparison. Conning developed a summary analysis of the ten-year period 2006 to 2015 and found that the median non-loss cost ratio for the Wholesale Composite continued to have a favorable 1.2 point variance from the Retail Composite.

8. Why did Conning use median instead of average in the analysis?

Conning measured and compared the non-loss cost ratios of each composite for the six-year period 2010 to 2015 using the median, weighted average and simple average as follows.

Year	2010 - 2015 Data Expense Ratio		
	Wholesale Composite	Retail Composite	Difference
Median	31.1%	32.10%	-1.0%
Weighted Average	31.1%	28.70%	2.4%
Simple Average	32.8%	32.50%	0.3%

Using 2015 data, Conning’s in-depth analysis of each measurement noted negligible differences between the 30.3% median and 30.2% weighted average measurements for the ten largest companies in the Wholesale Composite. Conning also found relatively small differences between the 30.3% median and 30.2% weighted average for the ten largest wholesale companies and the 31.1% median and 30.8% weighted average for the total Wholesale Composite. However, Conning noted larger differences between the 28.7% median and 27.0% weighted average measurements for the ten largest companies in the Retail Composite, and much larger differences between the 28.7% median and 27.0% weighted average for the ten largest retail companies and the 32.2% median and 28.8% weighted average for the total Retail Composite. Conning attributed the larger variances in the Retail Composite to the fact that the two largest companies in the Retail Composite represents 20% of the Composite’s premium, and had non-loss cost ratios under 25%. This is further evidenced by the simple average, which generated higher but much less variable ratios for both composites.

As a result, the use of weighted average ratios would have favored larger companies rather than weighting equally all companies in their respective composites. Therefore, Conning believes the median cost ratio measurement is more representative of the behavior of all companies in each composite and eliminates the impact of significant outliers on this analysis. By any measure, there is no appreciable difference in the cost ratios between the wholesale and retail composites.

9. How did you address the fact that surplus lines companies are not subject to standard premium taxes but their premiums are subject to surplus lines taxes?

The analysis was developed from insurer filing data as available through A.M. Best. While Conning included taxes, licenses and fees from the filing data, there is no accurate way to distinguish the type of tax applicable to insurance premiums included in the Wholesale or Retail Composite. However, it is important to understand the difference between premium taxes payable on standard or admitted insurance premium and surplus lines taxes payable on nonadmitted insurance premium.

In general, admitted insurance premium is subject to a state premium tax paid by the insurance company and reported through the taxes, licenses and fees line of the statutory Annual Statement. This expense to the insurance company represents 2.3% of the non-loss cost ratio for the Retail Composite included in Conning's analysis. Conversely, nonadmitted insurance premium is subject to a state surplus lines tax, which is paid by the insurance broker and therefore not captured within the taxes, licenses and fees line of the insurer's statutory Annual Statement. The surplus lines tax rate varies by state and the median surplus lines tax rate nationwide is 3.0%.

To eliminate the impact of taxes entirely from the analysis of non-loss costs to the insurance company, Conning calculated the median non-loss cost ratio, excluding the taxes, licenses and fees component altogether, of 29.6% and 30.2% for the Wholesale and Retail Composites, respectively. To better understand the impact of such taxes on the cost of the insurance transaction to the insurance buyer, it is important to understand the impact of taxes on the admitted and nonadmitted premium comprising each composite. **Illustration I** demonstrates the impact of taxes on the cost of the insurance transaction to the insurance buyer, based on the following:

- Conning estimates the admitted and nonadmitted premium within the Wholesale Composite to be 30.5% and 69.5%, respectively. As a result, 30.5% of the Wholesale Composite's direct written premium would be subject to the estimated state premium tax rate of 2.3% and 69.5% of the Wholesale Composite's direct written premium would be subject to the estimated state surplus lines tax rate of 3.0%.
- Conning estimates the admitted and nonadmitted premium within the Retail Composite to be 95.3% and 4.7%, respectively. As a result, 95.3% of the Retail Composite's direct written premium would be subject to the estimated state premium tax rate of 2.3% and 4.7% of the Retail Composite's direct written premium would be subject to the estimated state surplus lines tax rate of 3.0%.

Illustration I

(In millions)	Wholesale Composite			Retail Composite			Variance
	Premium Tax	Surplus Lines Tax	Total	Premium Tax	Surplus Lines Tax	Total	
Total Premium	19,100	19,100		60,600	60,600		
% Admitted	30.5%		30.5%	95.3%		95.3%	
% Nonadmitted		69.5%	69.5%		4.7%	4.7%	
Taxable Premium Base	5,826	13,275	100.0%	57,752	2,848	100.0%	
State Premium Tax Rate	2.3%			2.3%			
State Surplus Lines Tax Rate		3.0%			3.0%		
Estimated Taxes	134	398		1,328	85		
Estimated Tax Impact (Blended)			2.8%			2.3%	
Pre-Tax Cost Ratio			29.6%			30.2%	-0.6%
Post-Tax Cost Ratio			32.4%			32.5%	-0.1%

Based on these estimates, the cost of the retail channel includes a higher proportion of state premium taxes and the wholesale channel includes a higher proportion of state surplus lines taxes. Regardless, as illustrated above, taxes cause no material variance between the cost ratios of the composites, and the Wholesale Composite maintains a favorable 0.1 point variance to the Retail Composite.

10. How are broker fees and policy fees addressed in this analysis?

Broker fees, which are generally outlined in brokerage fee agreements, typically include fees charged by an insurance broker in exchange for services that constitute or arise out of the placement of insurance. Oftentimes, broker fees are charged directly to the insurance buyer in lieu of the broker collecting commission from the insurance company with whom the insurance is placed. Policy fees generally include fees charged by an insurance broker to defray the costs associated with issuing the policy (e.g., calculating, reporting and remitting surplus lines taxes to the state, issuing required notices, and inspection fees, among other administrative costs). Broker fees and policy fees are generally paid directly to the broker by the insured and, therefore, do not represent a component of non-loss costs reported through the insurer's statutory Annual Statement. As such, these fees are not included in Conning's analysis.

Broker fees and policy fees may be found within accounts comprising either the Wholesale or Retail Composites. Broker fees, which are more predominant in retail accounts, have some proportionate impact on the Retail Composite. Policy fees, which are more predominant in wholesale accounts, have some proportionate impact on the Wholesale Composite. However, NAPSLO and Conning believe accurately quantifying the impact of broker fees and policy fees on distribution costs was beyond the scope of the information available for this analysis.

11. When and why should a retail agent engage a wholesale broker?

Wholesale brokers are technical experts who work in a unique segment of the insurance industry and they provide retail agents, their clients and other insurance buyers access to skillfully-tailored insurance products and stable capital in the surplus lines market. Retail agents and insureds look to wholesalers for access to markets, coverages and options they may not be able to find in the standard market. It is the wholesaler's valuable technical expertise and knowledge of the specialty markets that helps retail agents and their clients solve problems and identify the right option for the insured in the right market – products and markets that retailers don't work in every day.

12. Are there reasons for a retailer not using a wholesale broker when dealing with unique risks?

No. Wholesaler brokers provide retailers with a broader perspective on specialty lines of insurance products, backed by very strong, stable and highly-rated surplus lines insurance companies. Retail agents and brokers from the smallest to largest agencies use and benefit from the wholesaler's solutions-oriented approach and real-time knowledge of the market, capacity, pricing, insurer risk appetites, market best terms and product design. The value of the wholesaler's technical knowledge of the market is demonstrated by their responsiveness and cost-effective delivery of solutions, which facilitates strong client relationships between retail agents and the insured clients. The most successful transactions happen when wholesale brokers and retailers work together to customize solutions for clients.

Based on Conning's analysis, the wholesale distribution channel adds no cost to the transaction. Yet, the value that wholesalers offer to retail agents and insurance brokers – technical expertise, innovative solutions to complex risks, access to strong and stable surplus lines insurers – can be very significant in properly placing specialty risks. Retail agents and insurance buyers who don't already partner with a NAPSLO wholesaler as their trusted expert are encouraged to find one. While there has never been a price for seeking a wholesale quote, Conning's analysis demonstrates there is no additional cost in leveraging a wholesale specialist to find the best solution for the insured.

Insurers Included in Retail Composite

ACE Insurance Company (Puerto Rico)
 Aetna Insurance Company of Connecticut
 Affiliated FM Insurance Company
 Affinity Mutual Insurance Company
 AGCS Marine Insurance Company
 AIG Insurance Company-Puerto Rico
 Aioi Nissay Dowa Insurance Co of America
 All America Insurance Company
 Allianz Underwriters Insurance Company
 America First Insurance Company
 America First Lloyds Insurance Co
 American Capital Assurance Corp
 American Casualty Company of Reading, PA
 American Country Insurance Company
 American Economy Insurance Company
 American Fire and Casualty Company
 American Guarantee and Liability Ins Co
 American Insurance Company
 American States Insurance Company of TX
 American Steamship Owners Mut P & I Asn
 Argonaut Great Central Insurance Company
 ARI Mutual Insurance Company
 Associated Mutual Insurance Cooperative
 Association Casualty Insurance Company
 Athens Financial Insurance Co
 AXA Art Insurance Corporation
 AXA Insurance Company
 Butte Mutual Insurance Company
 California Mutual Insurance Company
 Cambria County Mutual Insurance Company
 Capitol Casualty Company
 Capitol County Mutual Fire Insurance Co
 Caribbean American Property Insurance Co
 Censtat Casualty Company
 Center Valley Mutual Fire Insurance Co
 Century Insurance Company (Guam) Ltd.
 Chicago Insurance Company
 Cincinnati Insurance Company
 Cincinnati Specialty Underwriters Ins Co
 Columbia Casualty Company
 Columbia Mutual Insurance Company
 Constitution Insurance Company
 Continental Casualty Company
 Continental Insurance Co of NJ
 Dentists Benefits Insurance Company
 Discover Property & Casualty Ins Co
 Doctors Company An Interinsurance Exch
 Dongbu Ins. Co., Ltd. GUB
 Dorchester Insurance Company, Ltd
 Dryden Mutual Insurance Company
 Eastern Mutual Insurance Company
 Echelon Prop & Cas Insurance Company
 EMC Property & Casualty Company
 Employers Mutual Casualty Company
 Exact Property and Casualty Company
 Executive Risk Indemnity Inc
 Executive Risk Specialty Insurance Co
 Farm Family Casualty Insurance Company
 Farmers Mut Fire Ins Co McCandless Twsp
 Farmers Mutual Insurance Company
 FCCI Advantage Insurance Company
 FCCI Commercial Insurance Company
 Federal Insurance Company
 Federated Service Insurance Company
 Fiduciary Insurance Company of America
 Financial Pacific Insurance Company
 Fireman's Fund Insurance Co of HI Inc
 Fireman's Fund Insurance Company of Ohio
 First Security Insurance of Hawaii Inc
 Firstline National Insurance Company
 Florists' Insurance Company
 Foremost Signature Insurance Company
 Fortress Insurance Company
 Frontline Insurance Unlimited Company
 General Casualty Company of Wisconsin
 General Security Indemnity Co of Arizona
 General Security National Insurance Co
 Genesis Insurance Company
 Golden Eagle Insurance Corporation
 Governmental Interinsurance Exchange
 Great American Assurance Company
 Great American Contemporary Insurance Co
 Great American Fidelity Insurance Co
 Great American Insurance Company of NY
 Great American Security Insurance Co
 Great Midwest Insurance Company
 Great West Casualty Company
 Greater New York Mutual Insurance Co
 Greenwich Insurance Company
 Grinnell Mutual Reinsurance Company
 GuideOne Elite Insurance Company
 Hamilton Mutual Insurance Company
 Hanover Fire & Casualty Insurance Co
 Hanover Insurance Company

Hanover Lloyd's Insurance Company
Harford Mutual Insurance Company
Harleystown Insurance Co of New York
Harleystown Insurance Company
Harleystown Lake States Insurance Co
Harleystown Preferred Insurance Company
Harleystown Worcester Insurance Company
Hartland Mutual Insurance Co
Health Care Indemnity Inc
Healthcare Underwriters Grp Mutual of OH
Heartland Mutual Insurance Company
Hochheim Prairie Farm Mutual Ins Assn
Holyoke Mutual Insurance Co in Salem
Home and Farm Insurance Company
Homeland Insurance Company of Delaware
Homeland Insurance Company of New York
Hospitality Mutual Insurance Co
HSB Specialty Insurance Company
Idaho Counties Risk Mgt Program, Undrwtr
Illinois Casualty Company
Illinois EMCASCO Insurance Company
Illinois National Insurance Company
Illinois Union Insurance Company
Independent Mutual Fire Insurance Co
Indian Harbor Insurance Company
Indiana Insurance Company
Insurance Company of Greater New York
ISMIE Mutual Insurance Company
Jefferson Insurance Company
Jewelers Mutual Insurance Company
Keystone Mutual Insurance Company
Lebanon Valley Insurance Company
MAPFRE Insurance Company of Florida
MAPFRE PRAICO Insurance Company
Massachusetts Bay Insurance Company
Medical Mutual Insurance Co of NC
Medical Mutual Insurance Company of ME
Medical Mutual Liability Ins Soc of MD
Medical Professional Mutual Insurance Co
Medical Security Insurance Company
Medicus Insurance Company
Medmarc Casualty Insurance Company
Mercer Insurance Co of NJ, Inc.
Mercer Insurance Company
Merchants Mutual Insurance Company
Merchants National Insurance Company
Mid-American Fire & Casualty Company
Mid-Continent Assurance Company
Mid-Continent Casualty Company
Mid-Continent Excess & Surplus Ins Co

Midrox Insurance Company
Midwestern Indemnity Company
Millers Capital Insurance Company
Millville Insurance Company of New York
Missouri Doctors Mutual Insurance Co
Missouri Professionals Mutual-Physicians
MMIC Insurance, Inc.
Monterey Insurance Company
Mower County Farmers Mutual Ins Co
MPM Insurance Company of Kansas
MSA Insurance Company
Mutual Savings Fire Insurance Company
National Continental Insurance Company
National Fire Insurance Co of Hartford
National Surety Corporation
National Union Fire Ins Co Pittsburgh PA
Neighborhood Spirit P & C Co
Netherlands Insurance Company
Nevada Capital Insurance Company
Nevada Mutual Insurance Company
New England Guaranty Insurance Co, Inc
North American Elite Insurance Company
North River Insurance Company
Northern Security Insurance Company Inc
Northwest Dentists Insurance Company
Nutmeg Insurance Company
OHA Insurance Solutions Inc
Ohio Casualty Insurance Company
Ohio Security Insurance Company
Oklahoma Surety Company
Old Reliable Casualty Company
Old Republic Union Insurance Company
Oregon Automobile Insurance Company
Oswego County Mutual Insurance Company
PA Physicians Reciprocal Insurers
Peerless Indemnity Insurance Company
Peerless Insurance Company
Penn Millers Insurance Company
Pennsylvania Lumbermens Mutual Ins Co
Pharmacists Mutual Insurance Company
Philadelphia Indemnity Insurance Company
Physicians Ins Program Exch
Physicians Insurance A Mutual Company
Physicians Insurance Company
Physicians Insurance Mutual
Physicians Reciprocal Insurers
Plaza Insurance Company
PLICO, Inc.
Positive Physicians Insurance Exchange
Princeton Insurance Company

Professional Casualty Association
Professionals Advocate Insurance Company
Progressive Express Insurance Company
Property-Owners Insurance Company
Protection Mutual Ins Co of Littlestown
QBE Seguros
Rainier Insurance Company
Real Legacy Assurance Company, Inc.
Red Shield Insurance Company
Regent Insurance Company
Republic-Franklin Insurance Company
Republic-Vanguard Insurance Company
Rural Trust Insurance Company
RVOS Farm Mutual Insurance Company
Safecard Service Insurance Company
Samsung F & M Insurance Co, Ltd USB
Sanilac Mutual Insurance Company
Savers P & C Ins Co
Seaworthy Insurance Company
Security Plan Fire Insurance Company
Selective Fire & Casualty Insurance Co
Selective Insurance Co of SC
Selective Insurance Company of America
Selective Way Insurance Company
Sentinel Insurance Company Ltd
Sentry Lloyds of Texas
Sentry Select Insurance Company
Shelter General Insurance Company
Southern Guaranty Insurance Company
Spring Valley Mutual Insurance Company
St Paul Fire & Casualty Insurance Co
St Paul Fire and Marine Insurance Co
St Paul Guardian Insurance Company
St Paul Mercury Insurance Company
Stone Valley Mutual Fire Insurance Co
Strathmore Insurance Company
Tank Owner Members Insurance Company
TDC Specialty Insurance Company
Texas Heritage Insurance Company
TM Specialty Insurance Company
Tokio Marine America Insurance Company
Tokio Marine Specialty Insurance Company
Transamerica Casualty Insurance Company
Travelers Casualty Company
Travelers Casualty Insurance Co of Amer

Travelers Indemnity Company
Travelers Lloyds Insurance Company
Truck Insurance Exchange
U S Underwriters Insurance Company

Unigard Indemnity Company
Union National Fire Insurance Company
United Casualty Insurance Co of America
United Fire & Casualty Company
United Fire Lloyds
USPlate Glass Insurance Company
Utica First Insurance Company
Utica Lloyd's of Texas
Utica Mutual Insurance Company
Utica National Insurance Co of Ohio
Utica Specialty Risk Insurance Co
Valley Forge Insurance Company
Vermont Accident Insurance Company, Inc
West American Insurance Company
West Virginia Mutual Insurance Company
Western Community Insurance Company
Western National Assurance Company
Westfield Insurance Company
Westminster American Insurance Company
White Pine Insurance Company
Wisconsin Municipal Mutual Insurance Co
XL Insurance America, Inc.
XL Select Insurance Company

Insurers Included in Wholesale Composite

Acceptance Casualty Insurance Company
 Acceptance Indemnity Insurance Company
 Admiral Indemnity Company
 Admiral Insurance Company
 Alterra America Insurance Company
 Alterra Excess & Surplus Insurance Co
 American Empire Surplus Lines Ins Co
 American Hallmark Insurance Co of TX
 American Safety Indemnity Company
 Arch Specialty Insurance Company
 Aspen Specialty Insurance Company
 Associated International Insurance Co
 Atlantic Casualty Insurance Company
 AXIS Surplus Insurance Company
 Burlington Insurance Company
 Canal Indemnity Company
 Canal Insurance Company
 Capitol Indemnity Corporation
 Capitol Specialty Insurance Corporation
 Catlin Specialty Insurance Company
 Century Surety Company
 Chubb Custom Insurance Company
 Colony Insurance Company
 Diamond State Insurance Company
 Essex Insurance Company
 Evanston Insurance Company
 Everest Indemnity Insurance Company
 Falls Lake National Insurance Company
 First Financial Insurance Company
 First Mercury Insurance Company
 Gemini Insurance Company
 General Star Indemnity Company
 General Star National Insurance Co
 Gotham Insurance Company
 Great American E&S Insurance Company
 Hallmark County Mutual Insurance Company
 Hallmark Specialty Insurance Company
 HCC Specialty Insurance Company
 Houston Casualty Company
 Houston Specialty Insurance Company
 Hudson Excess Insurance Company
 Hudson Specialty Insurance Company
 James River Casualty Company
 James River Insurance Company
 Kinsale Insurance Company
 Landmark American Insurance Company
 Markel American Insurance Company
 Maxum Casualty Insurance Company
 Maxum Indemnity Company
 Mount Vernon Fire Insurance Company
 Mt Hawley Insurance Company
 National Casualty Company
 National Indemnity Company
 Nautilus Insurance Company
 Navigators Specialty Insurance Company
 North American Capacity Insurance Co
 Northfield Insurance Company
 Northland Casualty Company
 Northland Insurance Company
 Penn-America Insurance Company
 Penn-Star Insurance Company
 Prime Insurance Company
 Prime Property & Casualty Insurance Inc.
 RLI Insurance Company
 Rockhill Insurance Company
 RSUI Indemnity Company
 Scottsdale Indemnity Company
 Scottsdale Insurance Company
 Scottsdale Surplus Lines Insurance Co
 Seneca Insurance Company Inc
 Seneca Specialty Insurance Company
 Starstone Specialty Insurance Company
 Stratford Insurance Company
 Tudor Insurance Company
 U.S. Specialty Insurance Company
 United National Insurance Company
 United National Specialty Insurance Co
 United States Liability Insurance Co
 Westchester Fire Insurance Company
 Westchester Surplus Lines Insurance Co
 Western Heritage Insurance Company
 Western World Insurance Company
 Wilshire Insurance Company