

State: Maryland

Filing Company: Allstate North American Insurance Company

TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name: ANAIC PPA

Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Table of Contents

User Usage Agreement Attachments

Usage Agreement

[Usage Agreement.pdf](#)

SERFF Tracking #: ALSE-133899186

State Tracking #: TELEMATICS

Company Tracking #: R56002 A#2: INTRODUCTION
OF ANAIC AUTO ...

State: Maryland

Filing Company: Allstate North American Insurance Company

TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name: ANAIC PPA

Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Filing at a Glance

| | |
|---------------------------|---|
| Company: | Allstate North American Insurance Company |
| Product Name: | ANAIC PPA |
| State: | Maryland |
| TOI: | 19.0 Personal Auto |
| Sub-TOI: | 19.0001 Private Passenger Auto (PPA) |
| Filing Type: | Rate/Rule |
| Date Submitted: | 11/21/2023 |
| SERFF Tr Num: | ALSE-133899186 |
| SERFF Status: | Closed-Received Under Competitive Rating |
| State Tr Num: | TELEMATICS |
| State Status: | Complete |
| Co Tr Num: | R56002 A#2: INTRODUCTION OF ANAIC AUTO (ASC) |
| Effective Date | 04/16/2024 |
| Requested (New): | |
| Effective Date | 10/16/2024 |
| Requested (Renewal): | |
| Author(s): | Jennifer Olson, Lizett Mendez, Deborah Larsen |
| Reviewer(s): | Bruce Siegel (primary), Walter Dabrowski |
| Disposition Date: | 03/04/2024 |
| Disposition Status: | Received Under Competitive Rating |
| Effective Date (New): | 04/16/2024 |
| Effective Date (Renewal): | |

State: MarylandFiling Company: Allstate North American Insurance Company

TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name: ANAIC PPA

Project Name/Number: Introduction of ANAIC Auto/RITM05584542

General Information

Project Name: Introduction of ANAIC AutoStatus of Filing in Domicile:

Project Number: RITM05584542Domicile Status Comments:

Reference Organization:Reference Number:

Reference Title:Advisory Org. Circular:

Filing Status Changed: 03/04/2024

State Status Changed: 03/04/2024Deemer Date:

Created By: Deborah LarsenSubmitted By: Deborah Larsen

Corresponding Filing Tracking Number: ALSE-133862697

Filing Description:

This filing details the introduction of the Allstate North American Insurance Company (ANAIC) Private Passenger Auto Program in the state of Maryland.

Further information can be found in the enclosed attachments.

Company and Contact

Filing Contact Information

Deborah Larsen, Executive Administrative dlarb@allstate.com

Assistant

2775 Sanders Rd 847-402-1885 [Phone]

Northbrook, IL 60062

Filing Company Information

Allstate North American Insurance CompanyCoCode: 11110State of Domicile: Illinois

2775 Sanders RdGroup Code: 8Company Type: Property & Casualty

Suite A2WGroup Name: AllstateState ID Number:

Northbrook, IL 60062FEIN Number: 36-4442776

(847) 402-5000 ext. [Phone]

State: MarylandFiling Company: Allstate North American Insurance Company

TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name: ANAIC PPA

Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Filing Fees

State Fees

Fee Required? Yes

Fee Amount: \$125.00

Retaliatory? No

Fee Explanation: \$125.00 per rate/rule filing per company

Per Company: Yes

| Company | Amount | Date Processed | Transaction # |
|---|----------|---------------------|---------------|
| Allstate North American Insurance Company | \$125.00 | 11/21/2023 04:31 PM | 273295336 |
| EFT Total | \$125.00 | | |

State Specific

Upon your submission of this filing, does this filing meet our filing requirements listed in the GENERAL INSTRUCTIONS?: Yes

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

Correspondence Summary

Dispositions

| Status | Created By | Created On | Date Submitted |
|-----------------------------------|--------------|------------|----------------|
| Received Under Competitive Rating | Bruce Siegel | 03/04/2024 | 03/04/2024 |

Objection Letters and Response Letters

Objection Letters

| Status | Created By | Created On | Date Submitted |
|---------------------------|--------------|------------|----------------|
| Pending Industry Response | Bruce Siegel | 02/09/2024 | 02/09/2024 |
| Pending Industry Response | Bruce Siegel | 12/11/2023 | 12/11/2023 |

Response Letters

| Responded By | Created On | Date Submitted |
|----------------|------------|----------------|
| Deborah Larsen | 02/20/2024 | 02/20/2024 |
| Deborah Larsen | 01/11/2024 | 01/11/2024 |

Amendments

| Schedule | Schedule Item Name | Created By | Created On | Date Submitted |
|---------------------|--------------------|----------------|------------|----------------|
| Supporting Document | Objection Response | Deborah Larsen | 01/12/2024 | 01/12/2024 |

Filing Notes

| Subject | Note Type | Created By | Created On | Date Submitted |
|--|------------------|------------------|------------|----------------|
| Status | Note To Filer | Walter Dabrowski | 02/07/2024 | 02/07/2024 |
| Status Update Request | Note To Reviewer | Deborah Larsen | 02/07/2024 | 02/07/2024 |
| Request for Objection Response Extension | Note To Reviewer | Deborah Larsen | 12/18/2023 | 12/18/2023 |

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

Disposition

Disposition Date: 03/04/2024

Effective Date (New): 04/16/2024

Effective Date (Renewal):

Status: Received Under Competitive Rating

Comment:

| Company Name: | Overall % Indicated Change: | Overall % Rate Impact: | Written Premium Change for this Program: | Number of Policy Holders Affected for this Program: | Written Premium for this Program: | Maximum % Change (where req'd): | Minimum % Change (where req'd): |
|---|-----------------------------|------------------------|--|---|-----------------------------------|---------------------------------|---------------------------------|
| Allstate North American Insurance Company | % | % | | | | % | % |

| Schedule | Schedule Item | Schedule Item Status | Public Access |
|---------------------|--------------------------------------|----------------------|---------------|
| Rate (revised) | Entire Manual | | Yes |
| Rate | Entire Manual | | Yes |
| Rate | Entire Manual | | Yes |
| Supporting Document | P&C Actuarial Justification | | Yes |
| Supporting Document | Personal Auto Guide | | Yes |
| Supporting Document | P&C Third Party Filing Authorization | | Yes |
| Supporting Document | Certification Statement | | Yes |
| Supporting Document | Objection Response | | Yes |
| Supporting Document | P&C Actuarial Justification | | Yes |
| Supporting Document | Objection Response | | Yes |

State: Maryland **Filing Company:** Allstate North American Insurance Company
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: ANAIC PPA
Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Objection Letter

| | |
|-------------------------|---------------------------|
| Objection Letter Status | Pending Industry Response |
| Objection Letter Date | 02/09/2024 |
| Submitted Date | 02/09/2024 |
| Respond By Date | 02/20/2024 |

Dear Deborah Larsen,

Introduction:

For further consideration, please provide or modify the following:

Objection 1

- P&C Actuarial Justification (Supporting Document)
 - Objection Response (Supporting Document)
- Comments: Define acronym SDK as used in the filing.

Objection 2

- P&C Actuarial Justification (Supporting Document)
 - Objection Response (Supporting Document)
- Comments: UG:

Disclaimer exists on the right to deviate. This is a common personal PPA filing. Code section 27-501(a)(2) mandates following the set company's underwriting standards.

Financial responsibility (FR) -19s might be used in Maryland, as opposed to SR-22.

Moratoriums have to adhere to the Code of Maryland Regulations (COMAR) 31.08.12.00 et al.

(Obj. 3)

Objection 3

- P&C Actuarial Justification (Supporting Document)
- Comments: Filing 99315, ISM7 are not found. (Obj. 5)

Objection 4

- Objection Response (Supporting Document)

Comments: When a former UBI participant reenrolls, there should be a new score applied from a current driving period, as opposed to a 12-month old score. The policyholder might agree to the use of a previous score.

Plus, when a driver cancels the UBI monitoring program, how long is the scoring continued used?

(Obj. 6)

Conclusion:

SERFF Tracking #: ALSE-133899186

State Tracking #: TELEMATICS

Company Tracking #: R56002 A#2: INTRODUCTION
OF ANAIC AUTO ...

State: Maryland

Filing Company: Allstate North American Insurance Company

TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name: ANAIC PPA

Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Please provide the requested information.

Sincerely,

Bruce Siegel

State: Maryland **Filing Company:** Allstate North American Insurance Company
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: ANAIC PPA
Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Objection Letter

| | |
|-------------------------|---------------------------|
| Objection Letter Status | Pending Industry Response |
| Objection Letter Date | 12/11/2023 |
| Submitted Date | 12/11/2023 |
| Respond By Date | 01/12/2024 |

Dear Deborah Larsen,

Introduction:

The Maryland Insurance Administration (MIA) has received and reviewed your submission. For further consideration, please provide or modify the following:

Objection 1

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)
Comments: Who are the third-party vendors that provide mileage data?

Objection 2

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)
Comments: Why are the point limit rates for EUIM (Enhanced Underinsured Motorist) < UM (Uninsured Motorist)?

Objection 3

Comments: File the Underwriting Guidelines for the new program. (§ 27-501(h))

Objection 4

Comments: Send a territorial certification for the filing. (§ 11-319, COMAR 31.07.03)

Objection 5

- P&C Actuarial Justification (Supporting Document)
Comments: Filing 99874 is not found, for the TU (TransUnion) Credit Vision model.

Also, submit the company's version of TU's VHS (Vehicle History Score) model.

Objection 6

Comments: Please complete one of our questionnaires for the UBI program.

Additionally, when a former driver reenrolls, what score(s) are used?

(attachment)

Objection 7

- P&C Actuarial Justification (Supporting Document)
Comments: The SERFF field 'Status of Filing in Domicile' is blank on the first tab. Have the Kia & Hyundai adjustments been filed in other states?

Bulletin 23-3 (2/21/23)

Objection 8

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)

State: Maryland **Filing Company:** Allstate North American Insurance Company
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: ANAIC PPA
Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Comments: Moratorium exception letter B is missing. (COMAR 31.08.12.04)

Objection 9

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)
- P&C Actuarial Justification (Supporting Document)

Comments: Define the following:

SM7 and IFSA;

Fixed Expense - Part 1 & Part 2 -- be aware we don't allow for price optimization (policy life expectancy/survival)*;

the geovisible principal components used, up to # 49.

* See Objection on credit or insurance scoring in Maryland.

Objection 10

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)
- P&C Actuarial Justification (Supporting Document)

Comments: Rule 49:

Fees for late payments may not be assessed until at least two business days after the due date. Add such language to this rule. (§ 27-216(b)(3)(iii))

Objection 11

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)
- Personal Auto Guide (Supporting Document)

Comments: An insurer may not refuse to underwrite, cancel, refuse to renew, or increase the renewal premium based in whole or in part on the credit history of the insured or applicant. Credit history means any written, oral, or other communication of any information by a consumer reporting agency bearing on a consumers creditworthiness, credit standing or credit capacity. A consumer reporting agency includes an insurance company (see COMAR 31.15.11.03B(2)). An insurer may not use the insureds history of late premium payments and/or non-payment notices issued as the basis, in whole or in part, for a renewal premium increase.

An insurer may use the credit history of the applicant to rate a new business policy subject to the requirements found in §27-501(e-2)(4) and (5). These requirements include but are not limited to, a maximum impact rate of +/- 40%; a review of the credit history every two (2) years or sooner at the insureds request; and certain notifications and disclosures.

RP-13A: Delete variable Fullpay from consideration. (27-501(e-2)(3)(i)2)

Rule 10: every two to four renewals (not six), P/H credit scores are to be checked at minimum frequency, based on policy term.

Rule 52: A Fixed Expense factor is appropriate for policy acquisition costs & possibly operational costs but does not relate to credit characteristics (lapse, bad debt, payment history, prior insurance); N.B. too, automatic inflationary trend factors aren't permitted.

State: Maryland **Filing Company:** Allstate North American Insurance Company
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: ANAIC PPA
Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Insurance Article § 27-501(e-2), COMAR 31.15.11, Bulletin 21-26 (10.14.21)

Objection 12

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)

- Personal Auto Guide (Supporting Document)

Comments: RP-33A:

The number of times renewed goes from 4 to 10+ with increasing relativities. Note the stipulation in Insurance Article § 11-318(b)(1) for auto insurance after three years.

Rule 11 B uses five years in addition.

Conclusion:

Please provide the requested information by 12/26/2023. Your prompt response is greatly appreciated. If you have any questions or need clarification, feel free to contact me at 410-468-2313 or email bruce.siegel@maryland.gov.

Sincerely,

Bruce Siegel

Telematics Usage Based Insurance

Include the following items:

1. The name of any and all third party vendor(s) involved in the administration of the telematics program, including any company that receives data from the devices, provides devices to insureds, or develops any model or algorithm for the insurer.
2. The group or groups of insureds to whom this product will be offered.
3. A copy of the Usage Based participation agreement between the Insurer and the Policyholder. The agreement should contain the following:
 - a. The length of time the device must be in place.
 - b. An explanation of what happens if the device is prematurely removed from the vehicle or if it is temporarily removed (ex. If the car is in the care of a mechanic).
 - c. An explanation of each data point/driving characteristic that is collected.
 - d. A statement informing the insured whether or not they will have an opportunity to “redo” the data collection period.
4. A detailed description of all data the telematics device captures, including collected data that is not used in rating and the weight it has on the total Usage Based Insurance/Telematics factor.
5. An explanation of how often data is transmitted from the device to the Insurer, and what happens to data stored on the device if it is unable to be transmitted.
6. An explanation of who owns and maintains the data collected by the telematics device, for how long, and for what purpose (future or current).
7. An explanation of how the Usage Based Insurance/Telematics data is used to develop the associated discount.
8. Documentation proving the credibility of the data collected, including but not limited to the standard error rate of transmission/collection/reporting data from/to the Usage Based Insurance/Telematics device.
9. An explanation of how each data point (i.e. hard braking events, acceleration events, etc.) is rated/gauged/assigned its weight. For example, is a hard braking event considered coming to a complete stop within x amount of time from x amount of speed?
10. Whether a fee is charged for failure to return or damage to the UBI device. If a fee is to be charged, actuarial support and method of assessment must be provided.

State:Maryland

TOI/Sub-TOI:19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:ANAIC PPA

Project Name/Number:Introduction of ANAIC Auto/RITM05584542

Filing Company:Allstate North American Insurance Company

Response Letter

Response Letter StatusSubmitted to State

Response Letter Date02/20/2024

Submitted Date02/20/2024

Dear Bruce Siegel,

Introduction:

Good afternoon.

Response 1

Comments:

Attached please find our Objection Response and supporting documentation.

Related Objection 1

Applies To:

- P&C Actuarial Justification (Supporting Document)
- Objection Response (Supporting Document)

Comments: Define acronym SDK as used in the filing.

Changed Items:

No Form Schedule items changed.

| Rate Schedule Item Changes | | | | | |
|----------------------------|---------------|--|-------------|------------------------------|----------------------------------|
| Item No. | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Date Submitted |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 02/20/2024 By: Deborah Larsen |
| Previous Version | | | | | |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 01/11/2024 By: Deborah Larsen |
| Previous Version | | | | | |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 11/21/2023 By: Deborah Larsen |

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

| Supporting Document Schedule Item Changes | |
|---|--|
| Satisfied - Item: | Objection Response |
| Comments: | |
| Attachment(s): | MD PPA ANAIC R56002 Objection Response.pdf |

Response 2

Comments:

Please see our Objection Response and supporting documentation.

Related Objection 2

Applies To:

- P&C Actuarial Justification (Supporting Document)

- Objection Response (Supporting Document)

Comments: UG:

Disclaimer exists on the right to deviate. This is a common personal PPA filing. Code section 27-501(a)(2) mandates following the set company's underwriting standards.

Financial responsibility (FR) -19s might be used in Maryland, as opposed to SR-22.

Moratoriums have to adhere to the Code of Maryland Regulations (COMAR) 31.08.12.00 et al.

(Obj. 3)

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 3

Comments:

| | | | |
|-----------------------------|---|------------------------|---|
| State: | Maryland | Filing Company: | Allstate North American Insurance Company |
| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

Please see our Objection Response and supporting documentation.

Related Objection 3

Applies To:

- P&C Actuarial Justification (Supporting Document)

Comments: Filing 99315, ISM7 are not found. (Obj. 5)

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 4

Comments:

Please see our Objection Response and supporting documentation.

Related Objection 4

Applies To:

- Objection Response (Supporting Document)

Comments: When a former UBI participant reenrolls, there should be a new score applied from a current driving period, as opposed to a 12-month old score. The policyholder might agree to the use of a previous score.

Plus, when a driver cancels the UBI monitoring program, how long is the scoring continued used?

(Obj. 6)

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

| | | | | | |
|--------------------------|----------------|--------------------------|------------|----------------------------|---|
| SERFF Tracking #: | ALSE-133899186 | State Tracking #: | TELEMATICS | Company Tracking #: | R56002 A#2: INTRODUCTION OF ANAIC AUTO ... |
|--------------------------|----------------|--------------------------|------------|----------------------------|---|

| | | | |
|-----------------------------|---|------------------------|---|
| State: | Maryland | Filing Company: | Allstate North American Insurance Company |
| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

Please contact me if you have questions or need additional information.

Respectfully,

Deborah Larsen

Sincerely,

Deborah Larsen

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

Response Letter

Response Letter Status

Submitted to State

Response Letter Date

01/11/2024

Submitted Date

01/11/2024

Dear Bruce Siegel,

Introduction:

Good afternoon.

Attached please find documents in response to your Objections of 12/11/2023. Please contact me if you have questions or need additional information.

Response 1

Comments:

Please see updated manual submitted

Related Objection 1

Applies To:

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)

Comments: Who are the third-party vendors that provide mileage data?

Changed Items:

No Form Schedule items changed.

| Rate Schedule Item Changes | | | | | |
|----------------------------|---------------|--|-------------|------------------------------|----------------------------------|
| Item No. | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Date Submitted |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 01/11/2024 By: Deborah Larsen |
| Previous Version | | | | | |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 11/21/2023 By: Deborah Larsen |

| | | | | | |
|--------------------------|----------------|--------------------------|------------|----------------------------|---|
| SERFF Tracking #: | ALSE-133899186 | State Tracking #: | TELEMATICS | Company Tracking #: | R56002 A#2: INTRODUCTION OF ANAIC AUTO ... |
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| | | | |
|-----------------------------|---|------------------------|---|
| State: | Maryland | Filing Company: | Allstate North American Insurance Company |
| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

| Supporting Document Schedule Item Changes | |
|---|---|
| Satisfied - Item: | P&C Actuarial Justification |
| Comments: | |
| Attachment(s): | 3. MD PPA ANAIC R56002 Filing Memo.pdf MD ASC Auto NB RMP.pdf UBI Questionnaire.pdf |
| <i>Previous Version</i> | |
| Satisfied - Item: | <i>P&C Actuarial Justification</i> |
| Comments: | |
| Attachment(s): | <i>3. MD PPA ANAIC R56002 Filing Memo.pdf</i> |

| Supporting Document Schedule Item Changes | |
|---|---|
| Satisfied - Item: | P&C Actuarial Justification |
| Comments: | |
| Attachment(s): | 3. MD PPA ANAIC R56002 Filing Memo.pdf MD ASC Auto NB RMP.pdf UBI Questionnaire.pdf |
| <i>Previous Version</i> | |
| Satisfied - Item: | <i>P&C Actuarial Justification</i> |
| Comments: | |
| Attachment(s): | <i>3. MD PPA ANAIC R56002 Filing Memo.pdf</i> |

| | |
|--------------------------|-----------------------------|
| Satisfied - Item: | Certification Statement |
| Comments: | |
| Attachment(s): | Certification Statement.pdf |

Response 2

Comments:

Please updated manual submitted.

Related Objection 2

Applies To:

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)

Comments: Why are the point limit rates for EUIM (Enhanced Underinsured Motorist) < UM (Uninsured Motorist)?

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

Changed Items:

No Form Schedule items changed.

| Rate Schedule Item Changes | | | | | |
|----------------------------|---------------|--|-------------|------------------------------|----------------------------------|
| Item No. | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Date Submitted |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 01/11/2024 By: Deborah Larsen |
| Previous Version | | | | | |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 11/21/2023 By: Deborah Larsen |

No Supporting Documents changed.

Response 3

Comments:

Please see submitted response documents.

Related Objection 3

Comments: File the Underwriting Guidelines for the new program. (§ 27-501(h))

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 4

Comments:

Please see submitted response documents.

Related Objection 4

Comments: Send a territorial certification for the filing. (§ 11-319, COMAR 31.07.03)

Changed Items:

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 5

Comments:

Please see submitted response documents.

Related Objection 5

Applies To:

- P&C Actuarial Justification (Supporting Document)

Comments: Filing 99874 is not found, for the TU (TransUnion) Credit Vision model.

Also, submit the company's version of TU's VHS (Vehicle History Score) model.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

| Supporting Document Schedule Item Changes | |
|---|---|
| Satisfied - Item: | P&C Actuarial Justification |
| Comments: | |
| Attachment(s): | 3. MD PPA ANAIC R56002 Filing Memo.pdf MD ASC Auto NB RMP.pdf UBI Questionnaire.pdf |
| Previous Version | |
| Satisfied - Item: | P&C Actuarial Justification |
| Comments: | |
| Attachment(s): | 3. MD PPA ANAIC R56002 Filing Memo.pdf |

Response 6

Comments:

Please see submitted documents.

| | | | | | |
|--------------------------|----------------|--------------------------|------------|----------------------------|---|
| SERFF Tracking #: | ALSE-133899186 | State Tracking #: | TELEMATICS | Company Tracking #: | R56002 A#2: INTRODUCTION OF ANAIC AUTO ... |
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| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

Related Objection 6

Comments: Please complete one of our questionnaires for the UBI program.

Additionally, when a former driver reenrolls, what score(s) are used?

(attachment)

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 7

Comments:

Please see submitted response documents.

Related Objection 7

Applies To:

- P&C Actuarial Justification (Supporting Document)

Comments: The SERFF field 'Status of Filing in Domicile' is blank on the first tab. Have the Kia & Hyundai adjustments been filed in other states?

Bulletin 23-3 (2/21/23)

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

| | | | |
|-----------------------------|---|------------------------|---|
| State: | Maryland | Filing Company: | Allstate North American Insurance Company |
| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

| Supporting Document Schedule Item Changes | |
|---|---|
| Satisfied - Item: | P&C Actuarial Justification |
| Comments: | |
| Attachment(s): | 3. MD PPA ANAIC R56002 Filing Memo.pdf MD ASC Auto NB RMP.pdf UBI Questionnaire.pdf |
| <i>Previous Version</i> | |
| Satisfied - Item: | <i>P&C Actuarial Justification</i> |
| Comments: | |
| Attachment(s): | <i>3. MD PPA ANAIC R56002 Filing Memo.pdf</i> |

Response 8

Comments:

Please see updated manual submitted.

Related Objection 8

Applies To:

- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)

Comments: Moratorium exception letter B is missing. (COMAR 31.08.12.04)

Changed Items:

No Form Schedule items changed.

| Rate Schedule Item Changes | | | | | |
|----------------------------|---------------|--|-------------|------------------------------|----------------------------------|
| Item No. | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Date Submitted |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 01/11/2024 By: Deborah Larsen |
| <i>Previous Version</i> | | | | | |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 11/21/2023 By: Deborah Larsen |

No Supporting Documents changed.

Response 9

| | | | |
|-----------------------------|---|------------------------|---|
| State: | Maryland | Filing Company: | Allstate North American Insurance Company |
| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

Comments:
 Please see updated manual submitted.

Related Objection 9

Applies To:

- P&C Actuarial Justification (Supporting Document)
- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)

Comments: Define the following:

SM7 and IFSA;

Fixed Expense - Part 1 & Part 2 -- be aware we don't allow for price optimization (policy life expectancy/survival)*;

the geovariable principal components used, up to # 49.

* See Objection on credit or insurance scoring in Maryland.

Changed Items:
 No Form Schedule items changed.

| Rate Schedule Item Changes | | | | | |
|----------------------------|---------------|--|-------------|------------------------------|----------------------------------|
| Item No. | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Date Submitted |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 01/11/2024 By: Deborah Larsen |
| <i>Previous Version</i> | | | | | |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 11/21/2023 By: Deborah Larsen |

| | | | |
|-----------------------------|---|------------------------|---|
| State: | Maryland | Filing Company: | Allstate North American Insurance Company |
| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

| Supporting Document Schedule Item Changes | |
|---|---|
| Satisfied - Item: | P&C Actuarial Justification |
| Comments: | |
| Attachment(s): | 3. MD PPA ANAIC R56002 Filing Memo.pdf MD ASC Auto NB RMP.pdf UBI Questionnaire.pdf |
| <i>Previous Version</i> | |
| Satisfied - Item: | <i>P&C Actuarial Justification</i> |
| Comments: | |
| Attachment(s): | <i>3. MD PPA ANAIC R56002 Filing Memo.pdf</i> |

Response 10

Comments:

Please see updated manual submitted.

Related Objection 10

Applies To:

- P&C Actuarial Justification (Supporting Document)
- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)

Comments: Rule 49:

Fees for late payments may not be assessed until at least two business days after the due date. Add such language to this rule. (§ 27-216(b)(3)(iii))

Changed Items:

No Form Schedule items changed.

| Rate Schedule Item Changes | | | | | |
|----------------------------|---------------|--|-------------|------------------------------|----------------------------------|
| Item No. | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Date Submitted |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 01/11/2024 By: Deborah Larsen |
| <i>Previous Version</i> | | | | | |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 11/21/2023 By: Deborah Larsen |

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

| Supporting Document Schedule Item Changes | |
|---|---|
| Satisfied - Item: | P&C Actuarial Justification |
| Comments: | |
| Attachment(s): | 3. MD PPA ANAIC R56002 Filing Memo.pdf MD ASC Auto NB RMP.pdf UBI Questionnaire.pdf |
| Previous Version | |
| Satisfied - Item: | P&C Actuarial Justification |
| Comments: | |
| Attachment(s): | 3. MD PPA ANAIC R56002 Filing Memo.pdf |

Response 11

Comments:

Please see updated manual submitted.

Related Objection 11

- Applies To:
- Personal Auto Guide (Supporting Document)
 - Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)

| | | | |
|-----------------------------|---|------------------------|---|
| State: | Maryland | Filing Company: | Allstate North American Insurance Company |
| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

Comments: An insurer may not refuse to underwrite, cancel, refuse to renew, or increase the renewal premium based in whole or in part on the credit history of the insured or applicant. Credit history means any written, oral, or other communication of any information by a consumer reporting agency bearing on a consumers creditworthiness, credit standing or credit capacity. A consumer reporting agency includes an insurance company (see COMAR 31.15.11.03B(2)). An insurer may not use the insureds history of late premium payments and/or non-payment notices issued as the basis, in whole or in part, for a renewal premium increase.

An insurer may use the credit history of the applicant to rate a new business policy subject to the requirements found in §27-501(e-2)(4) and (5). These requirements include but are not limited to, a maximum impact rate of +/- 40%; a review of the credit history every two (2) years or sooner at the insureds request; and certain notifications and disclosures.

RP-13A: Delete variable Fullpay from consideration. (27-501(e-2)(3)(i)2)

Rule 10: every two to four renewals (not six), P/H credit scores are to be checked at minimum frequency, based on policy term.

Rule 52: A Fixed Expense factor is appropriate for policy acquisition costs & possibly operational costs but does not relate to credit characteristics (lapse, bad debt, payment history, prior insurance); N.B. too, automatic inflationary trend factors aren't permitted.

Insurance Article § 27-501(e-2), COMAR 31.15.11, Bulletin 21-26 (10.14.21)

Changed Items:

No Form Schedule items changed.

| Rate Schedule Item Changes | | | | | |
|----------------------------|---------------|--|-------------|------------------------------|----------------------------------|
| Item No. | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Date Submitted |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 01/11/2024 By: Deborah Larsen |
| <i>Previous Version</i> | | | | | |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 11/21/2023 By: Deborah Larsen |

No Supporting Documents changed.

Response 12

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

Comments:

Please see updated manual submitted.

Related Objection 12

Applies To:

- Personal Auto Guide (Supporting Document)
- Entire Manual , Rate Manual Parts 1 and 2, Rule Manual (Rate)

Comments: RP-33A:

The number of times renewed goes from 4 to 10+ with increasing relativities. Note the stipulation in Insurance Article § 11-318(b)(1) for auto insurance after three years.

Rule 11 B uses five years in addition.

Changed Items:

No Form Schedule items changed.

| Rate Schedule Item Changes | | | | | |
|----------------------------|---------------|--|-------------|------------------------------|----------------------------------|
| Item No. | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Date Submitted |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 01/11/2024 By: Deborah Larsen |
| Previous Version | | | | | |
| 1 | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 11/21/2023 By: Deborah Larsen |

No Supporting Documents changed.

Conclusion:

Respectfully,

Deborah Larsen
Sincerely,
Deborah Larsen

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

Amendment Letter

Submitted Date: 01/12/2024

Comments:

Good morning.

Attached please find our actual Objection Response that should have accompanied the documents submitted yesterday. Please accept my apologies this was not included. Please contact me if you have questions or need additional information.

Respectfully,

Deborah Larsen

Changed Items:

No Form Schedule Items Changed.

No Rate Schedule Items Changed.

| Supporting Document Schedule Item Changes | |
|---|--|
| Satisfied - Item: | Objection Response |
| Comments: | |
| Attachment(s): | MD PPA ANAIC R56002 Objection Response.pdf |

State: MarylandFiling Company: Allstate North American Insurance Company

TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name: ANAIC PPA

Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Note To Filer

Created By:

Walter Dabrowski on 02/07/2024 12:08 PM

Last Edited By:

Walter Dabrowski

Submitted On:

02/07/2024 12:08 PM

Subject:

Status

Comments:

Due to a large backlog this filing is still under review.

State: Maryland

Filing Company: Allstate North American Insurance Company

TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name: ANAIC PPA

Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Note To Reviewer

Created By:

Deborah Larsen on 02/07/2024 11:48 AM

Last Edited By:

Deborah Larsen

Submitted On:

02/07/2024 11:48 AM

Subject:

Status Update Request

Comments:

Good afternoon.

Would it be possible to receive a status update on this filing? Thank you for your consideration.

Respectfully,

Deborah Larsen

State: Maryland

Filing Company: Allstate North American Insurance Company

TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name: ANAIC PPA

Project Name/Number: Introduction of ANAIC Auto/RITM05584542

Note To Reviewer

Created By:

Deborah Larsen on 12/18/2023 10:40 AM

Last Edited By:

Deborah Larsen

Submitted On:

12/18/2023 10:42 AM

Subject:

Request for Objection Response Extension

Comments:

Good morning.

Given the upcoming holidays and scheduled PTO for staff, would it be possible to receive an extension to 1/12/2024 to submit our Objection Response? Thank you very much for your consideration.

Respectfully,

Deborah Larsen

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

Rate Information

Rate data applies to filing.

Filing Method:

File and Use

Rate Change Type:

%

Overall Percentage of Last Rate Revision:

%

Effective Date of Last Rate Revision:

Filing Method of Last Filing:

SERFF Tracking Number of Last Filing:

Company Rate Information

| Company Name: | Overall % Indicated Change: | Overall % Rate Impact: | Written Premium Change for this Program: | Number of Policy Holders Affected for this Program: | Written Premium for this Program: | Maximum % Change (where req'd): | Minimum % Change (where req'd): |
|---|-----------------------------|------------------------|--|---|-----------------------------------|---------------------------------|---------------------------------|
| Allstate North American Insurance Company | % | % | | | | % | % |

State:Maryland

TOI/Sub-TOI:19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:ANAIC PPA

Project Name/Number:Introduction of ANAIC Auto/RITM05584542

Filing Company:Allstate North American Insurance Company

Rate/Rule Schedule

| Item No. | Schedule Item Status | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Attachments |
|----------|----------------------|---------------|--|-------------|------------------------------|--|
| 1 | | Entire Manual | Rate Manual Parts 1 and 2, Rule Manual | New | | 5. MD PPA ANAIC R56002 Rate Manual Part 2.pdf 5. MD PPA ANAIC R56002 A#1 Rate Manual Part 1.pdf 4. MD PPA ANAIC R56002 A#2 Rule Manual.pdf |

| | | | | | |
|--------------------------|----------------|--------------------------|------------|----------------------------|---|
| SERFF Tracking #: | ALSE-133899186 | State Tracking #: | TELEMATICS | Company Tracking #: | R56002 A#2: INTRODUCTION OF ANAIC AUTO ... |
|--------------------------|----------------|--------------------------|------------|----------------------------|---|

| | | | |
|-----------------------------|---|------------------------|---|
| State: | Maryland | Filing Company: | Allstate North American Insurance Company |
| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

Supporting Document Schedules

| | |
|--------------------------|---|
| Satisfied - Item: | P&C Actuarial Justification |
| Comments: | |
| Attachment(s): | 3. MD PPA ANAIC R56002 Filing Memo.pdf MD ASC Auto NB RMP.pdf UBI Questionnaire.pdf |
| Item Status: | |
| Status Date: | |

| | |
|--------------------------|---------------------|
| Satisfied - Item: | Personal Auto Guide |
| Comments: | Acknowledged |
| Attachment(s): | |
| Item Status: | |
| Status Date: | |

| | |
|-------------------------|--------------------------------------|
| Bypassed - Item: | P&C Third Party Filing Authorization |
| Bypass Reason: | N/A |
| Attachment(s): | |
| Item Status: | |
| Status Date: | |

| | |
|--------------------------|-----------------------------|
| Satisfied - Item: | Certification Statement |
| Comments: | |
| Attachment(s): | Certification Statement.pdf |
| Item Status: | |
| Status Date: | |

| | |
|--------------------------|--|
| Satisfied - Item: | Objection Response |
| Comments: | |
| Attachment(s): | MD PPA ANAIC R56002 Objection Response.pdf |
| Item Status: | |
| Status Date: | |

| | |
|--------------------------|--|
| Satisfied - Item: | Objection Response |
| Comments: | |
| Attachment(s): | MD PPA ANAIC R56002 Objection Response.pdf |

State:

Maryland

Filing Company:

Allstate North American Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

ANAIC PPA

Project Name/Number:

Introduction of ANAIC Auto/RITM05584542

| | |
|--------------|--|
| Item Status: | |
| Status Date: | |

| | | | |
|-----------------------------|---|------------------------|---|
| State: | Maryland | Filing Company: | Allstate North American Insurance Company |
| TOI/Sub-TOI: | 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA) | | |
| Product Name: | ANAIC PPA | | |
| Project Name/Number: | Introduction of ANAIC Auto/RITM05584542 | | |

Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

| Creation Date | Schedule Item Status | Schedule | Schedule Item Name | Replacement Creation Date | Attached Document(s) |
|---------------|-------------------------|---------------------|-----------------------------|------------------------------|--|
| 01/11/2024 | | Rate | Entire Manual | 02/20/2024 | 5. MD PPA ANAIC R56002 Rate Manual Part 2.pdf 5. MD PPA ANAIC R56002 A#1 Rate Manual Part 1.pdf 4. MD PPA ANAIC R56002 A#1 Rule Manual.pdf (Superceded) |
| 11/21/2023 | | Rate | Entire Manual | 01/11/2024 | 5. MD PPA ANAIC R56002 Rate Manual Part 1.pdf (Superceded) 5. MD PPA ANAIC R56002 Rate Manual Part 2.pdf 4. MD PPA ANAIC R56002 Rule Manual.pdf (Superceded) |
| 11/21/2023 | | Supporting Document | P&C Actuarial Justification | 01/11/2024 | 3. MD PPA ANAIC R56002 Filing Memo.pdf |