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User Usage Agreement

Attachments

Usage Agreement [Usage Agreement.pdf](#)

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Automobile Policy Endorsement - Named Non-Owner Coverage	A467H		A467H (06-22).pdf
Kansas Insurance ID Card	KS Digital ID Card		KS Digital ID Card 2019.pdf
Application for Insurance	NBUS_APP		NBUS_APP (11-23).pdf
Kansas Information and Option Form	RE316KS		RE316KS (05-16).pdf
Signature Page	SIGPGCW		SIGPGCW (07-20).pdf
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Automobile Policy Endorsement - Lapse of Coverage	UE-135		UE-135 (12-11).pdf
Additional Insured Endorsement	UE30		UE30 (03-22).pdf
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Automobile Policy Amendment - Emergency Road Service Coverage	A-115		A-115 (04-08).pdf
Automobile Policy Amendment - Additional Personal Injury Protection Amendment (Kansas)	A127		A127 (06-12).pdf
Automobile Policy Endorsement - Multi-Risk Physical Damage Coverage	A180L		A180L (06-12).pdf
Kansas Family Automobile Insurance Policy	A30KS		A30KS(06-12).pdf

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Recreational Vehicle Endorsement - Full Timer - Vacation Liability Coverage	A438FT	A438FT(01-13).pdf
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Automobile Policy Amendment - Kansas	CC1169	CC1169 (11-18).pdf
Named Non-Owner Coverage	CC1216	CC1216 (5-07).pdf
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Insurance Application	DP1KS	DP1KS (05-19).pdf
Move Down Letter	MoveDnLtrKs	MoveDnLtrKs (12-14).pdf
Automobile Policy Endorsement - Suspension of Coverage	UE-11	UE-11 (11-11).pdf
Automobile Policy Endorsement - Use Restriction Premium Reduction	UE-115	UE-115 (12-11).pdf
Kansas Cancellation W/In 60 Days	VUND110	VUND110 (05-13).pdf
Kansas Reissue Request Denied	VUND-306	VUND-306.pdf
Kansas Termination Letter	VUND41KS	VUND41KS (01-12).pdf
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Rate-Rule Attachments	(ex. Document Name	Attachment Name)
GEICO Casualty NNO ROC		KS GB GC NNO Rating ROC.pdf
GEICO Casualty Rating ROC		KS GB GC PPV Rating ROC.pdf
GEICO Casualty Symbol Pages		KS GB GC Symbol Insert Filing Part 1.pdf
GEICO Casualty Symbol Pages		KS GB GC Symbol Insert Filing Part 2.pdf
GEICO Casualty Symbol Pages		KS GB GC Symbol Insert Filing Part 3.pdf
GEICO Casualty Rate Manual		KS GB GC Rate Pages.pdf
GEICO Casualty General Rule Pages		GEICO Casualty & GEICO Marine General Rules - Kansas.pdf
GEICO Casualty Private Passenger Rule Pages		GEICO Casualty & GEICO Marine Private Passenger Rules - Kansas.pdf

Supporting Document Attachments	(ex. Supporting Document Name Attachment Name)
Explanatory Memo - Forms	KS GC Forms Filing Memo.pdf
Explanatory Memo - Rates	KS Filing Memo.pdf
Actuarial Justification	KS - Exhibit 1A.pdf
Actuarial Justification	KS - Exhibit 1B.pdf
Actuarial Justification	KS - Exhibit 2 - ROR.pdf
Complete and Current Manual for all Rate/Rule Filings	KS-GB-GC-Auto-Complete Manual_Part1.pdf
Complete and Current Manual for all Rate/Rule Filings	KS-GB-GC-Auto-Complete Manual_Part2.pdf
Complete and Current Manual for all Rate/Rule Filings	KS-GB-GC-Auto-Complete Manual_Part3.pdf
Complete and Current Manual for all Rate/Rule Filings	KS-GB-GC-Auto-Complete Manual_Part4.pdf
Exhibit of Premiums and Losses	KS GC Premium & Loss 2019 - 2023.pdf
Forms List Template	GC Complete Forms List (Current) - Automobile.pdf
Forms List Template	Kansas Forms List Template (1).pdf
Forms List Template	Kansas Forms List Template (2).pdf
Rate/Rule Filing Checklist	KS Attestation.pdf
Rate/Rule Filing Checklist	KS P&C Checklist.xlsm
<i>Rate/Rule Filing Checklist</i>	KS Attestation.pdf
<i>Rate/Rule Filing Checklist</i>	KS PC Checklist Final - Revised.xlsm
<i>Rate/Rule Filing Checklist</i>	KS PC Checklist Final.pdf
<i>Rate/Rule Filing Checklist</i>	KS Attestation.pdf
Redline Requirement	UE30 (06-11) vs (03-22).pdf
Redline Requirement	UE315 (03-06) vs (04-12).pdf
Filing Cover Letter and Change Sheet	KS 2024-146A Change Sheet.pdf
Filing Cover Letter and Change	KS 2024-146A Cover Letter.pdf

02/24/2025 Objection Response
Memo

[GB GC Response Memo 1.pdf](#)

03/27/2025 Objection Response

[GC Response Memo 2.pdf](#)

03/27/2025 Objection Response

[KS Actuarial Filing Memo.pdf](#)

03/27/2025 Objection Response

[KS Response Exhibit 1 - SOI.pdf](#)

03/27/2025 Objection Response

[KS Response Exhibit 2 - Indications Development.pdf](#)

03/27/2025 Objection Response

[KS Response Exhibit 3 - Weather Loading.pdf](#)

03/27/2025 Objection Response

[KS Response Exhibit 4 - Loss Development.pdf](#)

03/27/2025 Objection Response

[KS Response Exhibit 5 - Trend.pdf](#)

03/27/2025 Objection Response

[KS Response Exhibit 6 - ULAE.pdf](#)

03/27/2025 Objection Response

[KS Response Exhibit 7 - PLR and Expenses.pdf](#)

03/27/2025 Objection Response

[Statement of Variability - GEICO Casualty Company - KS.pdf](#)

Filing at a Glance

Company:	GEICO Casualty Company
Product Name:	146A-Auto Rate/Rule/Form
State:	Kansas
TOI:	19.0 Personal Auto
Sub-TOI:	19.0001 Private Passenger Auto (PPA)
Filing Type:	Rate/Rule/Form
Date Submitted:	02/14/2025
SERFF Tr Num:	GECC-134406571
SERFF Status:	Pending State Action
State Tr Num:	
State Status:	
Co Tr Num:	2024-146A
Effective Date	04/12/2025
Requested (New):	
Effective Date	
Requested (Renewal):	
Author(s):	Malissa O'Hara, Brittany Smith, Margaret West, Sara Miller
Reviewer(s):	Josh Carlson (primary)
Disposition Date:	
Disposition Status:	
Effective Date (New):	
Effective Date (Renewal):	

General Information

Project Name: 146A-Auto Rate/Rule/Form

Project Number: 2024-146A

Reference Organization:

Reference Title:

Filing Status Changed: 05/01/2025

State Status Changed:

Created By: Sara Miller

Corresponding Filing Tracking Number:

State TOI: 19.0 Personal Auto

Filing Description:

Status of Filing in Domicile:

Domicile Status Comments:

Reference Number:

Advisory Org. Circular:

Deemer Date:

Submitted By: Sara Miller

State Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Re:GEICO Casualty Company (GC)NAIC#: 031-41491
Automobile Casualty Manual – Rate/Rule/Forms Revision
File No.: 2024-146A

Dear Commissioner Schmidt:

For your review and approval, we are filing to implement a new Private Passenger automobile product in GEICO Casualty Company in Kansas.

A more detailed description and justification for the above changes is set forth in the enclosed filing memorandum and exhibits.

A complete rate and rule manual for the company is enclosed.

In addition, the above referenced company herewith submits a revision to our Automobile Casualty Form Manual currently on file with your department.

Specifically, alongside the previously approved forms in GEICO Casualty Company, we propose to place the following new/revised forms on file with your department:

New Forms:

A30KSG (01-24) – Kansas Automobile Insurance Policy
A467H (06-22) – Automobile Policy Endorsement - Named Non-Owner Coverage
KS Digital ID Card 2019 – Kansas Insurance ID Card
NBUS_APP (11-23) – Application for Insurance
RE316KS (05-16) – Kansas Information and Option Form
SIGPGCW (07-20) – Signature Page
UE12 (11-11) – Automobile Policy Endorsement - Reinstatement of Coverage
UE-135 (12-11) – Automobile Policy Endorsement - Lapse of Coverage

Revised Forms:

UE30 (03-22) – Additional Insured Endorsement
UE315 (04-12) – Automobile Policy Endorsement - Insurance for Custom Parts and Equipment

Additionally, we propose to withdraw the following forms:

Withdrawn Forms:

A-115 (04-08)
A127 (06-12)
A180L (06-12)
A30KS(06-12)
A-431 (08-06)
A438FT(01-13)
A438KS (08-16)
A54ED1 (03-14)
CC1169 (11-18)
CC1216 (5-07)
CRM316KS (05-16)

DP1KS (05-19)
MoveDnLtrKs (12-14)
UE-11 (11-11)
UE-115 (12-11)
UE-30 (06-11)
UE-315 (3-06)
VUND110 (05-13)
VUND-306
VUND41KS (01-12)
VUND41KSA (01-12)

Copies of the new/revised forms and markups are attached for your convenience.

The GEICO companies consider the materials and information provided to be confidential. We request that, should any person or entity seek these documents or the information provided, the Department will notify GEICO and give the GEICO companies an opportunity to assert confidentiality.

Once you have had an opportunity to review the enclosed, please forward your approval thereby allowing us to implement these revisions effective on or after April 12, 2025.

Sincerely,

Sara Miller
Analyst, Rating Product Implementation
Email: saramiller@geico.com

Enclosures

Company and Contact

Filing Contact Information

Sara Miller,	saramiller@geico.com
One GEICO Plaza	540-220-7952 [Phone]
Washington, DC 20076-0001	

Filing Company Information

GEICO Casualty Company	CoCode: 41491	State of Domicile: Nebraska
One GEICO Plaza	Group Code: 31	Company Type:
Washington, DC 20076-0001	Group Name: Berkshire Hathaway	State ID Number:
(800) 824-5404 ext. [Phone]	Group	
	FEIN Number: 52-1264413	

Filing Fees

State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

Correspondence Summary

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Disapproved and Not Filed	Josh Carlson	04/28/2025	04/28/2025
Disapproved and Not Filed	Josh Carlson	03/27/2025	03/27/2025
Disapproved and Not Filed	Josh Carlson	02/24/2025	02/24/2025

Response Letters

Responded By	Created On	Date Submitted
Sara Miller	04/30/2025	05/01/2025
Sara Miller	04/25/2025	04/25/2025
Sara Miller	03/20/2025	03/20/2025

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	04/28/2025
Submitted Date	04/28/2025
Respond By Date	

Dear Sara Miller,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

Comments: Pursuant to KSA 40-955(e) this rate filing will be reviewed by our independent actuary. The insurer is responsible for the cost of the actuary selected by the commissioner. The filing will remain disapproved & in abeyance status until the department receives a report from the actuary.

The model can be reviewed by an actuarial vendor, which will take approximately a month, and quotes around \$5,000. If selected, we will give you the actual quoted cost and ask for your payment agreed before proceeding with the work.

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Josh Carlson

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	03/27/2025
Submitted Date	03/27/2025
Respond By Date	04/27/2025

Dear Sara Miller,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

Comments: Please provide the method and support for the ultimate loss and ALAE/DCC selections within the experience period used. This is noted as "N/A", but should be included as a part of the ratemaking process.

Objection 2

Comments: Please disclose the trend assumptions and accompanying support (frequency, severity, pure premium, premium, fixed expense). This is noted as "N/A", but should be included as a part of the ratemaking process.

Objection 3

Comments: Provide support for the profit provision assumption.

Objection 4

Comments: Provide the midpoint of the experience period and midpoint of the expected policy date used to calculate the trend factors.

Objection 5

Comments: Provide the methods and support for the selected variable, fixed, and LAE related expense provision assumptions.

Objection 6

Comments: Discuss and provide support for any provisions for LAE in rates.

Objection 7

Comments: Include an explanation of how earnings or losses resulting from the investment of assets equal to the unearned premiums and loss reserves of the company or companies making the filing.

Objection 8

- Application for Insurance , NBUS_APP , (11-23) (Form)

Comments: In reviewing the captioned form, we find multiple brackets to signify variable language. Please provide this department with an exhibit of all possible variables used in the brackets. This appears necessary to avoid a potential violation of K.S.A. 40-216.

Objection 9

Comments: It doesn't appear the "KS GB Factor Support" documents were provided.

Objection 10

Comments: Discuss and provide support for any provisions for LAE in rates. This is noted in both the "factor support" documents and the confidential memo, but I am unable to locate it.

Objection 11

Comments: Are catastrophes used in the rate making process? If so, please discuss and provide support for any provisions for Catastrophe losses in rates. Additionally, discuss how due consideration was given to the identification of catastrophic perils or

events, the identification of catastrophe losses, the use of data in determining a provision for catastrophe losses, and the use of non-insurance data and models.

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Josh Carlson

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	02/24/2025
Submitted Date	02/24/2025
Respond By Date	03/26/2025

Dear Sara Miller,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

Comments: As stated in the filing rules, please update the checklist to include the specific exhibit and page number for each filing requirement, and reattach as an excel file. Those sections that are N/A are okay to remain the same.

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Josh Carlson

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	04/30/2025
Submitted Date	05/01/2025

Dear Josh Carlson,

Introduction:

Thank you for reviewing our filing. The following is in response to your Objection Letter dated 04/28/2025.

Response 1

Comments:

We hereby confirm that we agree to pay for the cost of the independent actuarial review.

Related Objection 1

Comments: Pursuant to KSA 40-955(e) this rate filing will be reviewed by our independent actuary. The insurer is responsible for the cost of the actuary selected by the commissioner. The filing will remain disapproved & in abeyance status until the department receives a report from the actuary.

The model can be reviewed by an actuarial vendor, which will take approximately a month, and quotes around \$5,000. If selected, we will give you the actual quoted cost and ask for your payment agreed before proceeding with the work.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Based on this additional information, we would appreciate your further consideration of our request.

Sincerely,

Sara Miller

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	04/25/2025
Submitted Date	04/25/2025

Dear Josh Carlson,

Introduction:

Thank you for reviewing our filing. The following is in response to your Objection Letter dated 03/27/2025.

Response 1

Comments:

Please refer to the attached Response Memo, the KS Response Exhibit 4 Loss Development and the KS Actuarial Filing Memo.

Related Objection 1

Comments: Please provide the method and support for the ultimate loss and ALAE/DCC selections within the experience period used. This is noted as "N/A", but should be included as a part of the ratemaking process.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 2

Comments:

Please refer to the attached Response Memo, the KS Response Exhibit 5 Trend and the KS Actuarial Filing Memo.

Related Objection 2

Comments: Please disclose the trend assumptions and accompanying support (frequency, severity, pure premium, premium, fixed expense). This is noted as "N/A", but should be included as a part of the ratemaking process.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 3**Comments:**

Please refer to the attached Response Memo, the KS - Exhibit 2 ROR and the KS Actuarial Filing Memo.

Related Objection 3

Comments: Provide support for the profit provision assumption.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 4

Comments:

Please refer to the attached Response Memo, the KS Response Exhibit 2 Indications Development and the KS Actuarial Filing Memo.

Related Objection 4

Comments: Provide the midpoint of the experience period and midpoint of the expected policy date used to calculate the trend factors.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 5

Comments:

Please refer to the attached Response Memo, the KS Response Exhibit 7 PLR and Expenses and the KS Actuarial Filing Memo.

Related Objection 5

Comments: Provide the methods and support for the selected variable, fixed, and LAE related expense provision assumptions.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 6

Comments:

Please refer to the attached Response Memo, the KS Response Exhibit 6 ULAE and the KS Actuarial Filing Memo.

Related Objection 6

Comments: Discuss and provide support for any provisions for LAE in rates.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 7

Comments:

Please refer to the attached Response Memo, the KS - Exhibit 2 ROR and the KS Actuarial Filing Memo.

Related Objection 7

Comments: Include an explanation of how earnings or losses resulting from the investment of as sets equal to the unearned premiums and loss reserves of the company or companies making the filing.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 8

Comments:

Please refer to the attached Response Memo and the Statement of Variability GEICO Casualty Company.

Related Objection 8

Applies To:

- Application for Insurance , NBUS_APP , (11-23) (Form)

Comments: In reviewing the captioned form, we find multiple brackets to signify variable language. Please provide this department with an exhibit of all possible variables used in the brackets. This appears necessary to avoid a potential violation of K.S.A. 40-216.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 9

Comments:

Please refer to the attached Response Memo and the KS GC Factor Support document.

Related Objection 9

Comments: It doesn't appear the "KS GB Factor Support" documents were provided.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 10

Comments:

Please refer to the attached Response Memo, the Response Exhibit 6 ULAE and the KS Actuarial Filing Memo.

Related Objection 10

Comments: Discuss and provide support for any provisions for LAE in rates. This is noted in both the "factor support" documents and the confidential memo, but I am unable to locate it.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Response 11

Comments:

Please refer to the attached Response Memo, the Response Exhibit 3 Weather Loading and the KS Actuarial Filing Memo. Additionally please refer to the revised P&C Checklist.

Related Objection 11

Comments: Are catastrophes used in the rate making process? If so, please discuss and provide support for any provisions for Catastrophe losses in rates. Additionally, discuss how due consideration was given to the identification of catastrophic perils or events, the identification of catastrophe losses, the use of data in determining a provision for catastrophe losses, and the use of non-insurance data and models.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate/Rule Filing Checklist
Comments:	
Attachment(s):	KS Attestation.pdf KS P&C Checklist.xlsm
Previous Version	
Satisfied - Item:	Rate/Rule Filing Checklist
Comments:	
Attachment(s):	KS Attestation.pdf KS PC Checklist Final - Revised.xlsm
Previous Version	
Satisfied - Item:	Rate/Rule Filing Checklist
Comments:	
Attachment(s):	KS PC Checklist Final.pdf KS Attestation.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate/Rule Filing Checklist
Comments:	
Attachment(s):	KS Attestation.pdf KS P&C Checklist.xlsm
<i>Previous Version</i>	
Satisfied - Item:	<i>Rate/Rule Filing Checklist</i>
Comments:	
Attachment(s):	<i>KS Attestation.pdf KS PC Checklist Final - Revised.xlsm</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Rate/Rule Filing Checklist</i>
Comments:	
Attachment(s):	<i>KS PC Checklist Final.pdf KS Attestation.pdf</i>

Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf

Conclusion:

Based on this additional information, we would appreciate your further consideration of our request.

Sincerely,

Sara Miller

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	03/20/2025
Submitted Date	03/20/2025

Dear Josh Carlson,

Introduction:

Thank you for reviewing our filing. The following is in response to your Objection Letter dated 02/24/2025.

Response 1

Comments:

Please refer to the attached Response Memo, the KS PC Checklist Final - Revised, the KS Confidential Memo - Revised, Confidential Exhibit - CW Call Time Lift Test, Confidential Exhibit - CW Call Time Lorenz Test, Confidential Exhibit - CW Lift All Coverage Test, Confidential Exhibit - CW Lorenz All Coverage Test, and KS Model Diagram.

Related Objection 1

Comments: As stated in the filing rules, please update the checklist to include the specific exhibit and page number for each filing requirement, and reattach as an excel file. Those sections that are N/A are okay to remain the same.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate/Rule Filing Checklist
Comments:	
Attachment(s):	KS Attestation.pdf KS PC Checklist Final - Revised.xlsm
Previous Version	
Satisfied - Item:	Rate/Rule Filing Checklist
Comments:	
Attachment(s):	KS PC Checklist Final.pdf KS Attestation.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate/Rule Filing Checklist
Comments:	
Attachment(s):	KS Attestation.pdf KS PC Checklist Final - Revised.xlsm
<i>Previous Version</i>	
Satisfied - Item:	<i>Rate/Rule Filing Checklist</i>
Comments:	
Attachment(s):	<i>KS PC Checklist Final.pdf KS Attestation.pdf</i>
Satisfied - Item:	02/24/2025 Objection Response Memo
Comments:	
Attachment(s):	GB GC Response Memo 1.pdf

Conclusion:

Based on this additional information, we would appreciate your further consideration of our request.

Sincerely,

Sara Miller

Form Schedule

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
1		Kansas Automobile Insurance Policy	A30KSG	(01-24)	PCF	New				A30KSG (01-24).pdf
2		Automobile Policy Endorsement - Named Non-Owner Coverage	A467H	(06-22)	END	New				A467H (06-22).pdf
3		Kansas Insurance ID Card	KS Digital ID Card	2019	CER	New				KS Digital ID Card 2019.pdf
4		Application for Insurance	NBUS_APP	(11-23)	ABE	New				NBUS_APP (11-23).pdf
5		Kansas Information and Option Form	RE316KS	(05-16)	ERS	New				RE316KS (05-16).pdf
6		Signature Page	SIGPGCW	(07-20)	OTH	New				SIGPGCW (07-20).pdf
7		Automobile Policy Endorsement - Reinstatement of Coverage	UE12	(11-11)	END	New				UE12 (11-11).pdf
8		Automobile Policy Endorsement - Lapse of Coverage	UE-135	(12-11)	END	New				UE-135 (12-11).pdf
9		Additional Insured Endorsement	UE30	(03-22)	END	Replaced	Previous Filing Number:	GECC-127328914		UE30 (03-22).pdf
							Replaced Form Number:	UE-30		
							Replaced Edition Date:	(06-11		
10		Additional Insured Endorsement	UE-30	(06-11)	END	Withdrawn	Previous Filing Number:	GECC-127328914		UE-30 (06-11).pdf
							Replaced Form Number:			
							Replaced Edition Date:			

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
11		Automobile Policy Endorsement - Insurance for Custom Parts and Equipment	UE315	(04-12)	END	Replaced	Previous Filing Number:	GECC-129640861		UE315 (04-12).pdf
							Replaced Form Number:	UE-315		
							Replaced Edition Date:	(3-06)		
12		Automobile Policy Endorsement - Insurance for Custom Parts and Equipment	UE-315	(3-06)	END	Withdrawn	Previous Filing Number:	GECC-129640861		UE-315 (3-06).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
13		Automobile Policy Amendment - Emergency Road Service Coverage	A-115	(04-08)	END	Withdrawn	Previous Filing Number:	GECC-129640861		A-115 (04-08).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
14		Automobile Policy Amendment - Additional Personal Injury Protection Amendment (Kansas)	A127	(06-12)	END	Withdrawn	Previous Filing Number:	GECC-129640861		A127 (06-12).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
15		Automobile Policy Endorsement - Multi-Risk Physical Damage Coverage	A180L	(06-12)	END	Withdrawn	Previous Filing Number:	GECC-129640861		A180L (06-12).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
16		Kansas Family Automobile Insurance Policy	A30KS	(06-12)	PCF	Withdrawn	Previous Filing Number:	GECC-129640861		A30KS(06-12).pdf
							Replaced Form Number:			
							Replaced Edition Date:			

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
17		Automobile Policy Amendment - Rental Reimbursement Amendment	A-431	(08-06)	END	Withdrawn	Previous Filing Number:	GECC-129640861		A-431 (08-06).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
18		Recreational Vehicle Endorsement - Full Timer - Vacation Liability Coverage	A438FT	(01-13)	END	Withdrawn	Previous Filing Number:	GECC-128891242		A438FT(01-13).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
19		Recreational Vehicle Coverage - Automobile Policy Endorsement	A438KS	(08-16)	END	Withdrawn	Previous Filing Number:	GECC-130776445		A438KS (08-16).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
20		Automobile Policy Amendment	A54ED1	(03-14)	END	Withdrawn	Previous Filing Number:	GECC-129739262		A54ED1 (03-14).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
21		Automobile Policy Amendment - Kansas	CC1169	(11-18)	END	Withdrawn	Previous Filing Number:	GECC-131744175		CC1169 (11-18).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
22		Named Non-Owner Coverage	CC1216	(5-07)	PCF	Withdrawn	Previous Filing Number:	GECC-125277046		CC1216 (5-07).pdf
							Replaced Form Number:			
							Replaced Edition Date:			

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
23		Kansas Information and Option Form	CRM316KS	(05-16)	PCF	Withdrawn	Previous Filing Number:	GECC-130664269		CRM316KS (05-16).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
24		Insurance Application	DP1KS	(05-19)	ABE	Withdrawn	Previous Filing Number:	GECC-132072765		DP1KS (05-19).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
25		Move Down Letter	MoveDnLtrKs	(12-14)	OTH	Withdrawn	Previous Filing Number:	GECC-129897177		MoveDnLtrKs (12-14).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
26		Automobile Policy Endorsement - Suspension of Coverage	UE-11	(11-11)	END	Withdrawn	Previous Filing Number:	GECC-129640861		UE-11 (11-11).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
27		Automobile Policy Endorsement - Use Restriction – Premium Reduction	UE-115	(12-11)	END	Withdrawn	Previous Filing Number:	GECC-129640861		UE-115 (12-11).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
28		Kansas Cancellation W/In 60 Days	VUND110	(05-13)	CNR	Withdrawn	Previous Filing Number:	GECC-129083043		VUND110 (05-13).pdf
							Replaced Form Number:			
							Replaced Edition Date:			

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
29		Kansas Reissue Request Denied	VUND-306		CNR	Withdrawn	Previous Filing Number:	N/A		VUND-306.pdf
							Replaced Form Number:			
							Replaced Edition Date:			
30		Kansas Termination Letter	VUND41KS	(01-12)	CNR	Withdrawn	Previous Filing Number:	GECC-128398000		VUND41KS (01-12).pdf
							Replaced Form Number:			
							Replaced Edition Date:			
31		Kansas Termination Letter	VUND41KSA	(01-12)	CNR	Withdrawn	Previous Filing Number:	GECC-128398000		VUND41KSA (01-12).pdf
							Replaced Form Number:			
							Replaced Edition Date:			

Form Type Legend:

ABE	Application/Binder/Enrollment	ADV	Advertising
BND	Bond	CER	Certificate
CNR	Canc/NonRen Notice	DEC	Declarations/Schedule
DSC	Disclosure/Notice	END	Endorsement/Amendment/Conditions
ERS	Election/Rejection/Supplemental Applications	OTH	Other

Rate Information

Rate data does NOT apply to filing.

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		GEICO Casualty NNO ROC	Entire Section	New		KS GB GC NNO Rating ROC.pdf
2		GEICO Casualty Rating ROC	Entire Section	New		KS GB GC PPV Rating ROC.pdf
3		GEICO Casualty Symbol Pages	Entire Section	New		KS GB GC Symbol Insert Filing Part 1.pdf KS GB GC Symbol Insert Filing Part 2.pdf KS GB GC Symbol Insert Filing Part 3.pdf
4		GEICO Casualty Rate Manual	Entire Section	New		KS GB GC Rate Pages.pdf
5		GEICO Casualty General Rule Pages	Entire Section	New		GEICO Casualty & GEICO Marine General Rules - Kansas.pdf
6		GEICO Casualty Private Passenger Rule Pages	Entire Section	New		GEICO Casualty & GEICO Marine Private Passenger Rules - Kansas.pdf

Supporting Document Schedules

Satisfied - Item:	Explanatory Memo - Forms
Comments:	
Attachment(s):	KS GC Forms Filing Memo.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS Filing Memo.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	KS - Exhibit 1A.pdf KS - Exhibit 1B.pdf KS - Exhibit 2 - ROR.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Complete and Current Manual for all Rate/Rule Filings
Comments:	
Attachment(s):	KS-GB-GC-Auto-Complete Manual_Part1.pdf KS-GB-GC-Auto-Complete Manual_Part2.pdf KS-GB-GC-Auto-Complete Manual_Part3.pdf KS-GB-GC-Auto-Complete Manual_Part4.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Exhibit of Premiums and Losses
Comments:	
Attachment(s):	KS GC Premium & Loss 2019 - 2023.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Explanatory Memo - Rules

Comments:	Please refer to the Public Memo provided under Explanatory Memo - Rates, which explains the overall changes.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Previously Approved Tracking Numbers
Comments:	Please see the Form Schedule tab.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Forms List Template
Comments:	
Attachment(s):	GC Complete Forms List (Current) - Automobile.pdf Kansas Forms List Template (1).pdf Kansas Forms List Template (2).pdf
Item Status:	
Status Date:	

Satisfied - Item:	Rate/Rule Filing Checklist
Comments:	
Attachment(s):	KS Attestation.pdf KS P&C Checklist.xlsm
Item Status:	
Status Date:	

Satisfied - Item:	Redline Requirement
Comments:	
Attachment(s):	UE30 (06-11) vs (03-22).pdf UE315 (03-06) vs (04-12).pdf
Item Status:	
Status Date:	

Satisfied - Item:	Filing Cover Letter and Change Sheet
Comments:	
Attachment(s):	KS 2024-146A Change Sheet.pdf KS 2024-146A Cover Letter.pdf
Item Status:	

Status Date:	
Satisfied - Item:	02/24/2025 Objection Response Memo
Comments:	
Attachment(s):	GB GC Response Memo 1.pdf
Item Status:	
Status Date:	
Satisfied - Item:	03/27/2025 Objection Response
Comments:	
Attachment(s):	GC Response Memo 2.pdf KS Actuarial Filing Memo.pdf KS Response Exhibit 1 - SOL.pdf KS Response Exhibit 2 - Indications Development.pdf KS Response Exhibit 3 - Weather Loading.pdf KS Response Exhibit 4 - Loss Development.pdf KS Response Exhibit 5 - Trend.pdf KS Response Exhibit 6 - ULAE.pdf KS Response Exhibit 7 - PLR and Expenses.pdf Statement of Variability - GEICO Casualty Company - KS.pdf
Item Status:	
Status Date:	

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)
03/20/2025		Supporting Document	Rate/Rule Filing Checklist	04/25/2025	KS Attestation.pdf KS PC Checklist Final - Revised.xlsm (Superceded)
02/05/2025		Supporting Document	Rate/Rule Filing Checklist	03/20/2025	KS PC Checklist Final.pdf (Superceded) KS Attestation.pdf