## **Table of Contents**

## User Usage Agreement Attachments Usage Agreement

Usage Agreement.pdf

Form Attachments Water Damage Coverage	(ex. Form Name MH-CW-C-0006	Form Number Attachment Name) MH-CW-C-0006-202304.pdf
Premises Liability	MH-CW-C-0007	MH-CW-C-0007-202110.pdf
Scheduled Personal Property	MH-CW-C-0012	MH-CW-C-0012-202304.pdf
Hobby Farming Coverage	MH-CW-C-0018	MH-CW-C-0018-202110.pdf
Limited Fungi, Wet or Dry Rot, or Bacteria Coverage - Property	MH-CW-C-0019	MH-CW-C-0019-202304.pdf
Secondary Residence Liability	MH-CW-C-0020	MH-CW-C-0020-202110.pdf
Water Backup and Sump Overflow	MH-CW-C-0021	MH-CW-C-0021-202110.pdf
Enhanced Coverage	MH-CW-C-0026	MH-CW-C-0026-202110.pdf
Home Equipment Breakdown Protection	MH-CW-C-0052	MH-CW-C-0052-202110.pdf
Homeowners Policy for Manufacture Homes	d MH-CW-P-0001	MH-CW-P-0001-202110.pdf
Premises Liability Fungi, Wet or Dry Rot, or Bacteria Exclusion	MH-CW-X-0002	MH-CW-X-0002-202304.pdf
Personal Liability Fungi, Wet or Dry Rot, or Bacteria Exclusion	MH-CW-X-0005	MH-CW-X-0005-202304.pdf
Special Provisions - Ohio	MH-OH-A-0001	MH-OH-A-0001-202311.pdf
Full Repair Cost with Roof Covering Restriction 16 Years Or Older	MH-CW-C-0035	MH-CW-C-0035-202110.pdf
Replacement Cost with Roof Covering Restriction 16 Years Or Older	MH-CW-C-0037	MH-CW-C-0037-202110.pdf
Replacement Cost Loss Settlement	MH-CW-C-0014	MH-CW-C-0014-201501.pdf
Full Repair Cost	MH-CW-C-0028	MH-CW-C-0028-201501.pdf
Manufactured Home Per Occurrence Deductible	MH-CW-C-0040	MH-CW-C-0040-201806.pdf

Rate-Rule Attachments

(ex. Document Name

OH Manufactured Home Program

Currently Approved Rate/Rule Manual

Manual

Attachment Name) <u>OH071MH-A.pdf</u> Currently Approved Rate and Rule Manual.pdf

Supporting Document (ex. Supporting Document Name Attachment Name) Attachments Filing Requirements Summary - P&C Exhibit C - Actuarial Indication Support.pdf Filing Requirements Summary - P&C OH MH Deductible Factors.pdf Filing Requirements Summary - P&C OH MH Water Factors.pdf Filing Requirements Summary - P&C Profit Loss Statement MH - CW.pdf Filing Requirements Summary - P&C Profit Loss Statement MH - OH.pdf Filing Requirements Summary - P&C Exhibit B - Rate Impacts v2.pdf Explanatory Memorandum Explanatory Memorandum.pdf Form Comparisons MH-CW-P-0001-201803 V. MH-CW-P-0001-202110.pdf Form Comparisons MH-CW-C-0006-201906 vs MH-CW-C-0006-202304.pdf Form Comparisons MH-CW-C-0007-201601 v MH-CW-C-0007-202110.pdf Form Comparisons MH-CW-C-0012-201501 V. MH-CW-C-0012-202304.pdf Form Comparisons MH-CW-C-0018-201807 V. MH-CW-C-0018-202110.pdf Form Comparisons MH-CW-C-0019-201501 V. MH-CW-C-0019-202304.pdf Form Comparisons MH-CW-C-0020-201601 v MH-CW-C-0020-202110.pdf Form Comparisons MH-CW-C-0021-201603 v MH-CW-C-0021-202110.pdf Form Comparisons MH-CW-C-0026-201603 V. MH-CW-C-0026-2021-10.pdf Form Comparisons IP-CW-C-0001-201501 V. MH-CW-C-0052-202110.pdf Form Comparisons MH-CW-X-0002-201501 V. MH-CW-X-0002-202304.pdf Form Comparisons MH-CW-X-0005-201501 vs MH-CW-X-0005-202304.pdf Form Comparisons MH-OH-A-0001-201501 vs MH-OH-A-0001-202311.pdf Exhibit SCS Exhibit SCS.pdf Current vs Proposed Marked Up [Compare Report] OH071MH-A.pdf

Policies Impacted by Increased Deductibles	Deductible Impacted Policies - Ohio Manufactured Home.pdf
Filing Requirements Summary - P&C	Exhibit B - Rate Impacts.pdf
Filing Requirements Summary - P&C	Exhibit C - Actuarial Indication Support.pdf
Filing Requirements Summary - P&C	OH MH Deductible Factors.pdf
Filing Requirements Summary - P&C	OH MH Water Factors.pdf
Filing Requirements Summary - P&C	Profit Loss Statement MH - CW.pdf
Filing Requirements Summary - P&C	Profit Loss Statement MH - OH.pdf
Current vs Proposed Marked Up Manual	Manual Mark Up Compare.pdf

# Filing at a Glance

-	
Company:	American Modern Property and Casualty Insurance Company
Product Name:	Manufactured Home Program
State:	Ohio
TOI:	04.0 Homeowners
Sub-TOI:	04.0002 Mobile Homeowners
Filing Type:	Form/Rate/Rule
Date Submitted:	02/16/2024
SERFF Tr Num:	AMMH-133992797
SERFF Status:	Closed-FILED
State Tr Num:	AMMH-133992797
State Status:	FILED
Co Tr Num:	MH-OH-2023SEP12-01
Effective Date	11/13/2024
Requested (New):	
Effective Date	12/07/2024
Requested (Renewal):	
Author(s):	Josh McDavid, Kirstie Vilardo
Reviewer(s):	Trent Emig (primary), Brad Schroer, Brad Wolfenbarger, Stewart Trego
Disposition Date:	05/02/2024
Disposition Status:	FILED
Effective Date (New):	11/13/2024
Effective Date (Renewal):	12/07/2024

## **General Information**

Project Name: OH MH Rate/Rule/Form Revisions Project Number: MH-OH-2023SEP12-01 Reference Organization: Reference Title: Filing Status Changed: 05/02/2024 State Status Changed: 05/02/2024 Created By: Josh McDavid Corresponding Filing Tracking Number: State TOI: 04.0 Homeowners Status of Filing in Domicile: Domicile Status Comments: Reference Number: Advisory Org. Circular:

Deemer Date: Submitted By: Josh McDavid

State Sub-TOI: 04.0002 Mobile Homeowners

Filing Description:

American Modern Property and Casualty Insurance Company submits for your review changes to our Manufactured Home Program. Please see the Explanatory Memorandum under Supporting Documentation tab for full details.

## **Company and Contact**

### **Filing Contact Information**

Josh McDavid,jmcdavid@amig.com7000 Midland Blvd.513-947-5854 [Phone]Amelia, OH 45102513-947-5854 [Phone]

### **Filing Company Information**

American Modern Property and Casualty Insurance Company 7000 Midland Boulevard Amelia, OH 45102 (800) 759-9008 ext. [Phone] CoCode: 42722 Group Code: 361 Group Name: Munich Re FEIN Number: 43-1262602 State of Domicile: Ohio Company Type: Property and Casualty State ID Number:

## **Filing Fees**

## **State Fees**

EFT Total		\$50.00			
American Modern Prope Insurance Company	erty and Casualty	\$50.00	02/16/2024 03:12 PM	279515792	
Company		Amount	Date Processed	Transaction #	
Per Company:	Yes				
Fee Explanation:	\$50.00 per fili	ng per company.			
Retaliatory?	No				
Fee Amount:	\$0.00				
Fee Required?	Yes				

# **State Specific**

Indicate Name of Statistical Reporting Agent (AAIS, ISO, ISSI, MSO, NCIS, NISS, OTIRB, SFAA, etc) Response REQUIRED on NEW Programs or NEW Lines of Business.: N/A

PUBLIC RECORD ACKNOWLEDGEMENT (REQUIRED FIELD): Acknowledge (by entering "YES") that everything submitted in this filing, with the exception of pages or parts of documents appropriately marked as trade secret pursuant to Ohio law and the Department's "Trade Secrets Policy," will become public record in accordance with R.C. 149.43, R.C. 1751.52, R.C. 3935.04, and/or R.C. 3937.03. (See General Instructions for further information.): Yes

FILING FEES VIA EFT: Confirm that via EFT you have submitted Ohio's filing fees of \$50 per company.: Yes

# **Correspondence Summary**

Dispositions

Status	Created By	Created On	Date Submitted
FILED	Stewart Trego	05/02/2024	05/02/2024

## **Objection Letters and Response Letters**

### **Objection Letters**

Objection Letters			Response Letters	Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Stewart Trego	04/22/2024	04/22/2024	Kirstie Vilardo	04/23/2024	05/01/2024
Pending Industry Response	Stewart Trego	04/05/2024	04/05/2024	Kirstie Vilardo	04/18/2024	04/18/2024
Pending Industry Response	Trent Emig	03/11/2024	03/11/2024	Josh McDavid	03/28/2024	03/28/2024
Pending Industry Response	Maureen Motter	02/23/2024	02/23/2024	Josh McDavid	02/23/2024	02/23/2024

### **Filing Notes**

Subject	Note Type	Created By	Created On	Date Submitted
RE: Effective Date	Note To Reviewer	Kirstie Vilardo	05/02/2024	05/02/2024
Effective Date Update	Note To Filer	Brad Schroer	05/01/2024	05/01/2024
Effective Date Update	Note To Reviewer	Kirstie Vilardo	05/01/2024	05/01/2024
AA Reviewed including 7/19 post submission update	Reviewer Note	Stewart Trego	05/02/2024	
AA Sent Letter	Reviewer Note	Stewart Trego	04/22/2024	
AA Sent Letter	Reviewer Note	Stewart Trego	04/05/2024	
CA Reviewed	Reviewer Note	Trent Emig	03/28/2024	
CA Sent Letter	Reviewer Note	Trent Emig	03/11/2024	

## Disposition

Disposition Date: 05/02/2024 Effective Date (New): 11/13/2024 Effective Date (Renewal): 12/07/2024 - Effective Date (New) changed from 09/11/2024 to 11/13/2024 and Effective Date (Renewal) changed from 10/05/2024 to 12/07/2024 by Trego, Stewart on 07/19/2024. Status: FILED

Comment: This filing, as submitted or as amended herein, is Approved under Chapter 3935, or Accepted under Chapter 3937, of the Ohio Revised Code.

EFFECTIVE DATES: Our records indicate you did/will implement this filing on the Effective Date(s) shown herein. If the effective dates are incorrect or you need to revise the effective date(s), submit a Post-Submission Update with the revised dates.

PUBLIC RECORD: Since filings become public record as of the effective date, changes of effective date(s) should be submitted PRIOR TO the effective date(s) originally requested.

	Overall %	Overall %	Written Premium	Number of Policy	Written	Maximum %	Minimum %
Company	Indicated	Rate	Change for	Holders Affected	Premium for	Change	Change
Name:	Change:	Impact:	this Program:	for this Program:	this Program:	(where req'd):	(where req'd):
American Modern Property and Casualty Insurance Company	-2.800%	0.000%	\$-34	10,140	\$7,577,741	195.600%	-12.000%

Schedule	Schedule Item	Schedule Item Status	Public Access
Form	Water Damage Coverage	Filed	Yes
Form	Premises Liability	Filed	Yes
Form	Scheduled Personal Property	Filed	Yes
Form	Hobby Farming Coverage	Filed	Yes
Form	Limited Fungi, Wet or Dry Rot, or Bacteria Coverage - Property	Filed	Yes
Form	Secondary Residence Liability	Filed	Yes
Form	Water Backup and Sump Overflow	Filed	Yes
Form	Enhanced Coverage	Filed	Yes
Form	Home Equipment Breakdown Protection	Filed	Yes

Schedule	Schedule Item	Schedule Item Status	Public Access
Form	Homeowners Policy for Manufactured Homes	Filed	Yes
Form	Premises Liability Fungi, Wet or Dry Rot, or Bacteria Exclusion	Filed	Yes
Form	Personal Liability Fungi, Wet or Dry Rot, or Bacteria Exclusion	Filed	Yes
Form	Special Provisions - Ohio	Filed	Yes
Form	Full Repair Cost with Roof Covering Restriction 16 Years Or Older	Filed	Yes
Form	Replacement Cost with Roof Covering Restriction 16 Years Or Older	Filed	Yes
Form	Replacement Cost Loss Settlement	Filed	Yes
Form	Full Repair Cost	Filed	Yes
Form	Manufactured Home Per Occurrence Deductible	Filed	Yes
Rate	OH Manufactured Home Program	Filed	Yes
Rate	Currently Approved Rate/Rule Manual	Filed	Yes
Supporting Document (revised)	Filing Requirements Summary - P&C	Filed	Yes
Supporting Document	Explanatory Memorandum	Filed	Yes
Supporting Document	Form Comparisons	Filed	Yes
Supporting Document	Exhibit SCS	Filed	Yes
Supporting Document (revised)	Current vs Proposed Marked Up Manual	Filed	Yes
Supporting Document	Policies Impacted by Increased Deductibles	Filed	Yes
Supporting Document	Filing Requirements Summary - P&C	Superseded/Withdrawn	Yes
Supporting Document	Current vs Proposed Marked Up Manual	Superseded/Withdrawn	Yes

Objection Letter StatusPending Industry ResponseObjection Letter Date04/22/2024Submitted Date04/22/2024Respond By Date05/06/2024

Dear Josh McDavid, Introduction: RESPOND BY:05/06/2024

In order for us to continue our review, please submit a complete response by the date shown above.

### **Objection 1**

Comments: Provide a revised Manual Mark Up Compare.pdf file using a larger font. The rating factors in the rate tables were illegible even with magnification.

### **Objection 2**

Comments: The response says that "9,776 insureds will be impacted by the minimum \$2500 Wind/Hail deductible", while the rate/rule schedule says that there are only 9,241 policy holders in this program. Provide the number of total insureds in this program, the number of insureds which currently have a wind/hail deductible that is below \$2500, and the number of insureds which currently have a deductible for All Other Peril that is below \$1000. Correct the rate/rule schedule if necessary.

### **Objection 3**

Comments: Explain the reason for removing the lower deductible options.

#### Conclusion:

Sincerely, Stewart Trego

Objection Letter StatusPending Industry ResponseObjection Letter Date04/05/2024Submitted Date04/05/2024Respond By Date04/19/2024

Dear Josh McDavid, Introduction: RESPOND BY:04/19/2024

In order for us to continue our review, please submit a complete response by the date shown above.

#### **Objection 1**

Comments: Provide a reconciliation of Exhibits B-1 and B-2 with the Overall % Rate Impact: and Written Premium Change for this Program: amounts shown on the Rate/Rule Schedule tab in SERFF.

#### **Objection 2**

Comments: Similar to the Form Comparisons files in the Supporting Documentation tab, provide similar markup versions of the rate pages.

#### **Objection 3**

Comments: Explain how many insureds will be impacted by the increased minimum wind/hail deductible, and how the new minimum of 2,500 was determined.

#### **Objection 4**

Comments: Provide details about the variables used to build the RMS v22 CAT model.

#### **Objection 5**

Comments: Provide support for the Catastrophe Model SCS Model calibration factor of 1.711 on Exhibit C-8 Page 1.

#### Conclusion:

Sincerely, Stewart Trego

Objection Letter StatusPending Industry ResponseObjection Letter Date03/11/2024Submitted Date03/11/2024Respond By Date04/01/2024

Dear Josh McDavid, Introduction: RESPOND BY 04/01/2024:

In order for us to continue our review, please submit a complete response by the date shown above.

#### **Objection 1**

Comments: For the following web address - http://state.amig.com/territoryInfo, the Territory Lookup Tool stops working when the State option is selected.

The following message is returned, There was a problem processing your request. If you are in need of assistance you can email our System Support Department during our normal business hours of 8:00 AM-5:00 PM EST Monday-Friday at systemsupport@amig.com. You may also contact us and leave a voicemail for an Analyst to return your call at 1-866-527-9583 between the hours of 8:00 AM-9:00 PM EST Monday-Friday, as well as weekends and Holidays.

Provide a functioning Territory Lookup Tool. Include all web addresses and required passwords.

#### **Objection 2**

Comments: Confirm you are aware that this filing is still under review by the actuarial analyst and additional questions may be submitted in a separate letter.

#### Conclusion:

Sincerely, Trent Emig

Objection Letter StatusPending Industry ResponseObjection Letter Date02/23/2024Submitted Date02/23/2024Respond By Date03/08/2024

Dear Josh McDavid, Introduction: RESPOND BY: 03/08/2024

In order for us to continue our review, please submit a complete response by the date shown above.

#### **Objection 1**

Comments: It appears to have been some time since we have received a complete set of the rates and rules used with this program/line of business.

Attach a complete set to the Rate/Rule Schedule. Include territory definitions, tiering rules, and similar items, if applicable to this program/line of business.

If you have responded to a similar request in a recent filing submission, provide the SERFF tracking # in lieu of the manual.

#### **Objection 2**

Comments: Confirm you are aware that this objection letter was sent as part of the intake process and that additional questions may be submitted in a separate letter.

#### **Conclusion:**

Sincerely, Maureen Motter

## **Response Letter**

Response Letter Status	Submitted to State
Response Letter Date	04/23/2024
Submitted Date	05/01/2024

#### Dear Trent Emig,

#### Introduction:

Thank you for your time.

#### Response 1

#### Comments:

We apologize for the inconvenience, please see the updated compare report that shows old text vs new text when hovering over the highlights.

#### **Related Objection 1**

Comments: Provide a revised Manual Mark Up Compare.pdf file using a larger font. The rating factors in the rate tables were illegible even with magnification.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes			
Satisfied - Item:	Current vs Proposed Marked Up Manual		
Comments:			
Attachment(s):	[Compare Report] OH071MH-A.pdf		
Previous Version			
Satisfied - Item:	Current vs Proposed Marked Up Manual		
Comments:			
Attachment(s):	Manual Mark Up Compare.pdf		

Response 2 Comments: Our Manufactured Home program allows for multi-unit policies (policies that include more than 1 home/unit) as well as Tenant policies (which were not impacted by the deductible change).

To clear up the lack of clarity around impacted units vs. impacted policies, we will send a Post Submission Update revising the SERFF Rate/Rule schedule to reflect the total number of units insured in this program, including Tenant, which is 10,140.

We have added a supplementary document Policies Impacted by Increased Deductibles, which displays both the number of affected units, and the number of affected policies. We apologize for the confusion around the reporting of units vs policies.

#### **Related Objection 2**

Comments: The response says that "9,776 insureds will be impacted by the minimum \$2500 Wind/Hail deductible", while the rate/rule schedule says that there are only 9,241 policy holders in this program. Provide the number of total insureds in this program, the number of insureds which currently have a wind/hail deductible that is below \$2500, and the number of insureds which currently have a deductible for All Other Peril that is below \$1000. Correct the rate/rule schedule if necessary.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Policies Impacted by Increased Deductibles
Comments:	
Attachment(s):	Deductible Impacted Policies - Ohio Manufactured Home.pdf

#### Response 3

Comments:

American Modern is in the process of a updating our minimum deductible options countrywide. Recent severity trends reflect the increased impact of inflation, both in Ohio and Countrywide, and increasing the minimum required deductible is one method to address these increases.

Prior to this filing, we have not made any updates to our available deductible options since we initially filed the program in 2015.

A review of recent competitor filings in Ohio shows that many other carriers are making similar adjustments to their programs. With respect to Wind/Hail deductibles, the following carriers have made recent filings to increase their Wind/Hail deductibles to either \$2,500 or \$2,000: Hastings Mutuals (HAST-133844639), Celina Mutual (CEIN-133866347), Western Reserve (WSRG-133871822) and Nationwide (NWPP-133903440).

We are providing an actuarially sounds rate credit for the higher minimum deductibles. Support for the deductible factors can found in OH MH Deductible Factors.pdf, under the supporting documents section.

#### **Related Objection 3**

Comments: Explain the reason for removing the lower deductible options.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

#### **Conclusion:**

Sincerely,

Kirstie Vilardo

## **Response Letter**

Response Letter Status	Submitted to State
Response Letter Date	04/18/2024
Submitted Date	04/18/2024

#### Dear Trent Emig,

#### Introduction:

Thank you for your correspondence.

#### **Response 1**

#### Comments:

We have revised Exhibit B-1 to display the overall rate impact, which matches the rate impact on the rate/rule schedule in SERFF.

In addition, our coverage change section was incomplete, so we have revised it to also list the new \$1,000 AOP deductible and correct coverage impact percentage. The rate impact is giving an apples-to-apples comparison of the rate change when coverage is held constant, and can be compared to the rate indications. This is the impact that we report in the rate/rule schedule for SERFF. The coverage impact provides the average premium change an insured will experience after accounting for the increased deductibles. So while the rate impact of this filing is 0.0%, on average insureds will see a premium that is 12.4% lower than their expiring policy due to them being moved to higher AOP and Wind/Hail deductibles, and receiving the corresponding credit for those higher deductibles.

Exhibit B-2 provides the rate impact histograms.

#### **Related Objection 1**

Comments: Provide a reconciliation of Exhibits B-1 and B-2 with the Overall % Rate Impact: and Written Premium Change for this Program: amounts shown on the Rate/Rule Schedule tab in SERFF.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document So	chedule Item Changes
Satisfied - Item:	Filing Requirements Summary - P&C
Comments:	
Attachment(s):	Exhibit C - Actuarial Indication Support.pdf OH MH Deductible Factors.pdf OH MH Water Factors.pdf Profit Loss Statement MH - CW.pdf Profit Loss Statement MH - OH.pdf Exhibit B - Rate Impacts v2.pdf
Previous Version	
Satisfied - Item:	Filing Requirements Summary - P&C
Comments:	
Attachment(s):	Exhibit B - Rate Impacts.pdf Exhibit C - Actuarial Indication Support.pdf OH MH Deductible Factors.pdf OH MH Water Factors.pdf Profit Loss Statement MH - CW.pdf Profit Loss Statement MH - OH.pdf

### Response 2

### Comments:

Please see the attached manual marked up comparison.

### **Related Objection 2**

Comments: Similar to the Form Comparisons files in the Supporting Documentation tab, provide similar markup versions of the rate pages.

### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Current vs Proposed Marked Up Manual
Comments:	
Attachment(s):	Manual Mark Up Compare.pdf

#### **Response 3**

#### Comments:

9,776 insureds will be impacted by the minimum \$2500 Wind/Hail deductible. 5,817 insureds will be impacted by the minimum \$1000 All Other Peril deductible.

#### **Related Objection 3**

Comments: Explain how many insureds will be impacted by the increased minimum wind/hail deductible, and how the new minimum of 2,500 was determined.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

#### Response 4

#### Comments:

In-force exposure data for American Modern Insurance Group (AMIG) as of 10/31/2022 was provided to our catastrophe modeling broker who used the model to ultimately calculate average annual losses (AALs) for each unit in the provided dataset. Primary exposure characteristics included in the dataset were used by the RMS model in calculating damageability ratios for each unit. These characteristics include geographic detail (e.g., unit street address, zip code, geolocation), occupancy type, construction type, year of construction, and building height; each characteristic is known for each unit in the AMIG exposure dataset. Damageability ratios together with policy characteristics (e.g., value, deductible) are sufficient for calculating AALs.

#### **Related Objection 4**

Comments: Provide details about the variables used to build the RMS v22 CAT model.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

#### **Response 5**

#### Comments:

Please reference Exhibit SCS, attached.

#### **Related Objection 5**

Comments: Provide support for the Catastrophe Model SCS Model calibration factor of 1.711 on Exhibit C-8 Page 1.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Exhibit SCS
Comments:	
Attachment(s):	Exhibit SCS.pdf

### Conclusion:

Thank you for your time. Sincerely,

Kirstie Vilardo

## **Response Letter**

Response Letter Status	Submitted to State
Response Letter Date	03/28/2024
Submitted Date	03/28/2024

Dear Trent Emig,

#### Introduction:

Thank you for your review of this filing. Please find our responses to your objections below.

#### **Response 1**

#### Comments:

We have corrected the issue that was preventing access to the link. Please note that until this filing is approved and implemented, the map link will not start returning the territory details for the filed flood maps. It will return territory details for all the prior approved maps. Please let us know if there is any additional detail we can provide regarding the flood maps.

#### **Related Objection 1**

Comments: For the following web address - http://state.amig.com/territoryInfo, the Territory Lookup Tool stops working when the State option is selected.

The following message is returned, There was a problem processing your request. If you are in need of assistance you can email our System Support Department during our normal business hours of 8:00 AM-5:00 PM EST Monday-Friday at systemsupport@amig.com. You may also contact us and leave a voicemail for an Analyst to return your call at 1-866-527-9583 between the hours of 8:00 AM-9:00 PM EST Monday-Friday, as well as weekends and Holidays.

Provide a functioning Territory Lookup Tool. Include all web addresses and required passwords.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

#### **Response 2**

#### Comments:

We confirm that we're aware this filing is still under review by the actuarial analyst, and that we may receive additional questions.

#### **Related Objection 2**

Comments: Confirm you are aware that this filing is still under review by the actuarial analyst and additional questions may be submitted in a separate letter.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

### Conclusion:

Thank you once again for your review. Please let us know of any additional questions or concerns you may have.

Sincerely, Josh McDavid

### **Response Letter**

Response Letter Status	Submitted to State
Response Letter Date	02/23/2024
Submitted Date	02/23/2024

#### Dear Trent Emig,

#### Introduction:

Thank you for your review of this filing. Please find our responses to your objections below:

#### **Response 1**

#### Comments:

We have attached a complete set of the currently approved rates and rules used with this program under the Rate/Rule Schedule as requested.

#### **Related Objection 1**

Comments: It appears to have been some time since we have received a complete set of the rates and rules used with this program/line of business.

Attach a complete set to the Rate/Rule Schedule. Include territory definitions, tiering rules, and similar items, if applicable to this program/line of business.

If you have responded to a similar request in a recent filing submission, provide the SERFF tracking # in lieu of the manual.

#### Changed Items:

No Form Schedule items changed.

Rate Schedule Item Changes					
ltem				Previous State Filing	
No.	Exhibit Name	Rule # or Page #	Rate Action	Number	Date Submitted
1	Currently Approved Rate/Rule Manual	All	Other		02/23/2024 By: Josh McDavid

No Supporting Documents changed.

#### Response 2

#### Comments:

We acknowledge that this letter was sent as part of the intake process, and that additional questions may be submitted in a separate letter.

#### **Related Objection 2**

Comments: Confirm you are aware that this objection letter was sent as part of the intake process and that additional questions may be submitted in a separate letter.

### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

### **Conclusion:**

Please let us know of any other questions or concerns you may have.

Sincerely,

Josh McDavid

## **Note To Reviewer**

Created By: Kirstie Vilardo on 05/02/2024 06:32 AM Last Edited By: Filing Rules Migration Submitted On: 11/13/2024 02:00 AM Subject: RE: Effective Date Comments: Dear Brad Schroer,

Thank you for your response. Once my prior Post Submission is allowed I will submit another to update the date. Or if you want to disallow it I can resubmit with the date.

## Note To Filer

**Created By:** 

Brad Schroer on 05/01/2024 02:54 PM

Last Edited By:

Filing Rules Migration

### Submitted On:

11/13/2024 02:00 AM

### Subject:

Effective Date Update

### Comments:

Thank you for notifying us that you will delay implementation of this filing. Submit a Post-Submission Update immediately with a requested effective date.

## **Note To Reviewer**

Created By: Kirstie Vilardo on 05/01/2024 02:11 PM Last Edited By: Filing Rules Migration Submitted On: 11/13/2024 02:00 AM Subject: Effective Date Update Comments: Dear Reviewer,

In addition to our objection responses and Post Submission Update, we would like to request to update the effective dates to the following:

09/11/2024 New Business 10/05/2024 Renewal Business

Thank you for your time.

Created By: Stewart Trego on 05/02/2024 12:56 PM Last Edited By: Filing Rules Migration Submitted On: 11/13/2024 02:00 AM Subject: AA Reviewed including 7/19 post submission update Comments:

Created By: Stewart Trego on 04/22/2024 09:40 AM Last Edited By: Filing Rules Migration Submitted On: 11/13/2024 02:00 AM Subject:

AA Sent Letter

Comments:

Created By: Stewart Trego on 04/05/2024 08:57 AM Last Edited By: Filing Rules Migration Submitted On: 11/13/2024 02:00 AM

- - - -

Subject:

AA Sent Letter

Comments:

Created By:

Trent Emig on 03/28/2024 09:25 AM

Last Edited By:

Filing Rules Migration

### Submitted On:

11/13/2024 02:00 AM

Subject:

CA Reviewed

### Comments:

Created By: Trent Emig on 03/11/2024 12:49 PM

Last Edited By:

Filing Rules Migration

## Submitted On:

11/13/2024 02:00 AM

Subject:

CA Sent Letter

### Comments:

# Post Submission Update Request Processed On 05/02/2024

Status:	Disallowed
Created By:	Kirstie Vilardo
Processed By:	Brad Schroer
Comments:	
Company Rate Information:	
Company Name: American Modern Property and Casualty Ins	urance Company

Field Name	Requested Change	Prior Value
Number of Policy Holders Affected for th	is 10140	9241
Program		

# Post Submission Update Request Processed On 07/19/2024

Status:	Allowed
Created By:	Josh McDavid
Processed By:	Stewart Trego
Comments:	

### **General Information:**

Requested Change	Prior Value
11/13/2024	09/11/2024
12/07/2024	10/05/2024
	11/13/2024

# Post Submission Update Request Processed On 05/02/2024

Status:	Allowed
Created By:	Kirstie Vilardo
Processed By:	Trent Emig
Comments:	

### **General Information:**

Field Name	Requested Change	Prior Value
Effective Date Requested (New)	09/11/2024	05/15/2024
Effective Date Requested (Renew)	10/05/2024	06/08/2024

### **Company Rate Information:**

Company Name: American Modern Property and Casualty Insurance Company

Field Name	Requested Change	Prior Value
Number of Policy Holders Affected for this	9241	
Program		

## Form Schedule

ltem	Schedule Item	Form	Form	Edition	Form	Form	Action Speci	fic	Readability																		
No.	Status	Name	Number	Date	Туре	Action	Data		Score	Attachments																	
1	Filed 05/02/2024	Water Damage Coverage	MH-CW-C- 0006	04-23	END	Replaced	Previous Filing Number:	AMMH- 132450425		MH-CW-C-0006- 202304.pdf																	
																								Replaced Form Number:	MH-CW-C-0006		
							Replaced Edition Date:	06-19																			
2	Filed 05/02/2024	Premises Liability	MH-CW-C- 0007	10-21	END	Replaced	Previous Filing Number:	АММН- 131724126		MH-CW-C-0007- 202110.pdf																	
								Replaced Form Number:	MH-CW-C-0007																		
							Replaced Edition Date:	01-16																			
3	Filed 05/02/2024 Scheduled Personal Property	Scheduled Personal Property	MH-CW-C- 0012			04-23 END R	C- 04-23 END F			4-23 END	END	END	3 END	04-23 END	Replaced	Previous Filing Number:	AMMH- 130106600		MH-CW-C-0012- 202304.pdf								
													Replaced Form Number:	MH-CW-C-0012													
							Replaced Edition Date:	01-15																			
4	Filed 05/02/2024	Hobby Farming Coverage	MH-CW-C-	MH-CW-C- 0018	10-21	END	Replaced	Previous Filing Number:	AMMH- 131724126		MH-CW-C-0018- 202110.pdf																
																	Replaced Form Number:	MH-CW-C-0018									
							Replaced Edition Date:	07-18																			
5	Filed 05/02/2024	Limited Fungi, Wet or Dry Rot, or Bacteria Coverage		04-23	END	Replaced	Previous Filing Number:	AMMH- 131724126		MH-CW-C-0019- 202304.pdf																	
		- Property								Replaced Form Number:	MH-CW-C-0019																
							Replaced Edition Date:	01-15																			
6	Filed 05/02/2024	Secondary Residence Liability	MH-CW-C- 0020	10-21	END	Replaced	Previous Filing Number:	AMMH- 131724126		MH-CW-C-0020- 202110.pdf																	
							Replaced Form Number:	MH-CW-C-0020																			
							Replaced Edition Date:	01-16																			

ltem	Schedule Item	Form	Form	Edition	Form	Form	Action Speci	fic	Readability																				
No.	Status	Name	Number	Date	Туре	Action	Data		Score	Attachments																			
7	Filed 05/02/2024	Water Backup and Sump Overflow	MH-CW-C- 0021	10-21	END	Replaced	Previous Filing Number:	АММН- 131724126		MH-CW-C-0021- 202110.pdf																			
											Replaced Form Number:	MH-CW-C-0021	-																
							Replaced Edition Date:	03-16	-																				
8	Filed 05/02/2024	ed 05/02/2024 Enhanced Coverage MH-CW-C- 10-21 END 0026	Replaced	Previous Filing Number:	AMMH- 131724126		MH-CW-C-0026- 202110.pdf																						
								Replaced Form Number:	MH-CW-C-0026	-																			
							Replaced Edition Date:	03-16	-																				
9	Filed 05/02/2024	led 05/02/2024 Home Equipment MH-CW Breakdown Protection 0052	MH-CW-C- 0052	10-21	10-21 END F	10-21 END	21 END	END	END	0-21 END I	10-21 END F	10-21 END F	10-21 END	10-21 END F	END	END	Replaced	Previous Filing Number:	AMMH- 130106600		MH-CW-C-0052- 202110.pdf								
										Replaced Form Number:	IP-CW-C-0001	-																	
							Replaced Edition Date:	01-15	-																				
10	Filed 05/02/2024	Homeowners Policy for Manufactured Homes	MH-CW-P- 0001	10-21	0-21 PCF	0-21 PCF	PCF	PCF	I PCF	10-21 PCF	10-21 PCF F	10-21 PCF F	10-21 PCF	Replaced	Previous Filing Number:	AMMH- 131724126		MH-CW-P-0001- 202110.pdf											
																Replaced Form Number:	MH-CW-P-0001	-											
																										Replaced Edition Date:	03-18	-	
11	Filed 05/02/2024	Premises Liability Fungi, Wet or Dry Rot, or	MH-CW-X- 0002	W-X- 04-23 END F	END	Replaced	Previous Filing Number:	AMMH- 130106600		MH-CW-X-0002- 202304.pdf																			
		Bacteria Exclusion																Replaced Form Number:	MH-CW-X-0002										
							Replaced Edition Date:	01-15																					
12	Filed 05/02/2024	Personal Liability Fungi, Wet or Dry Rot, or	MH-CW-X- 0005	04-23	END	Replaced	Previous Filing Number:	AMMH- 130106600		MH-CW-X-0005- 202304.pdf																			
		Bacteria Exclusion	0000				Replaced Form Number:	MH-CW-X-0005																					
							Replaced Edition Date:	01-15																					

ltem	Schedule Item	Form	Form	Edition	Form	Form	Action Speci	fic	Readability					
No.	Status	Name	Number	Date	Туре	Action	Data		Score	Attachments				
13	Filed 05/02/2024	Special Provisions - Ohio	MH-OH-A- 0001	11-23	END	Replaced	Previous Filing Number:	AMMH- 130106600		MH-OH-A-0001- 202311.pdf				
											Replaced Form Number:	MH-OH-A-0001		
							Replaced Edition Date:	01-15						
14	Filed 05/02/2024	Full Repair Cost with Roof Covering Restriction 16 Years Or Older	MH-CW-C- 0035	10-21	END	New				MH-CW-C-0035- 202110.pdf				
15	Filed 05/02/2024	Replacement Cost with Roof Covering Restriction 16 Years Or Older	MH-CW-C- 0037	10-21	END	New				MH-CW-C-0037- 202110.pdf				
16	Filed 05/02/2024	Replacement Cost Loss Settlement	MH-CW-C- 0014	01-15	1-15 END	Withdrawn	Previous Filing Number:	AMMH- 130106600		MH-CW-C-0014- 201501.pdf				
											Replaced Form Number:		_	
							Replaced Edition Date:		_					
17	Filed 05/02/2024	Full Repair Cost	III Repair Cost MH-CW-C- 01-15 END 0028	W-C- 01-15 END	1-15 END	Withdrawn	Previous Filing Number:	AMMH- 130106600		MH-CW-C-0028- 201501.pdf				
										Replaced Form Number:				
							Replaced Edition Date:		_					
18	Filed 05/02/2024	05/02/2024 Manufactured Home Per Occurrence Deductible 0040 ENI	END	Withdrawn	Previous Filing Number:	АММН- 131724126		MH-CW-C-0040- 201806.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	ОТН	Other

## **Rate Information**

Rate data applies to filing.

Filing Method:	File and Use
Rate Change Type:	Neutral
Overall Percentage of Last Rate Revision:	3.379%
Effective Date of Last Rate Revision:	01/12/2021
Filing Method of Last Filing:	File and Use
SERFF Tracking Number of Last Filing:	AMMH-132450425

## **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):
American Modern Property and Casualty Insurance Company	-2.800%	0.000%	\$-34	10,140	\$7,577,741	195.600%	-12.000%

## **Rate/Rule Schedule**

ltem	Schedule Item				Previous State	
No.	Status	Exhibit Name	Rule # or Page #	Rate Action	Filing Number	Attachments
1	Filed 05/02/2024	OH Manufactured Home Program	Rules and Rate Pages	Replacement	AMMH-132450425	OH071MH-A.pdf
2	Filed 05/02/2024	Currently Approved Rate/Rule Manual	All	Other		Currently Approved Rate and Rule Manual.pdf

# Supporting Document Schedules

Satisfied - Item:	Filing Requirements Summary - P&C
Comments:	
Attachment(s):	Exhibit C - Actuarial Indication Support.pdf OH MH Deductible Factors.pdf OH MH Water Factors.pdf Profit Loss Statement MH - CW.pdf Profit Loss Statement MH - OH.pdf Exhibit B - Rate Impacts v2.pdf
Item Status:	Filed
Status Date:	05/02/2024
Satisfied - Item:	Explanatory Memorandum
Comments:	
Attachment(s):	Explanatory Memorandum.pdf
Item Status:	Filed
Status Date:	05/02/2024
Satisfied - Item:	Form Comparisons
Comments:	
Attachment(s):	MH-CW-P-0001-201803 V. MH-CW-P-0001-202110.pdf MH-CW-C-0006-201906 vs MH-CW-C-0006-202304.pdf MH-CW-C-0007-201601 v MH-CW-C-0007-202110.pdf MH-CW-C-0018-201807 V. MH-CW-C-0018-202110.pdf MH-CW-C-0019-201501 V. MH-CW-C-0019-202304.pdf MH-CW-C-0020-201601 v MH-CW-C-0020-202110.pdf MH-CW-C-0021-201603 v MH-CW-C-0021-202110.pdf MH-CW-C-0026-201603 V. MH-CW-C-0026-2021-10.pdf IP-CW-C-0001-201501 V. MH-CW-C-0052-202110.pdf MH-CW-X-0002-201501 V. MH-CW-C-0052-202110.pdf MH-CW-X-0002-201501 V. MH-CW-C-0052-20210.pdf MH-CW-X-0002-201501 V. MH-CW-C-0052-20210.pdf MH-CW-X-0002-201501 V. MH-CW-C-0052-202304.pdf MH-CW-X-0002-201501 V. MH-CW-X-0002-202304.pdf MH-CW-X-0005-201501 vs MH-CW-X-0005-202304.pdf MH-CW-X-0005-201501 vs MH-CW-X-0005-202304.pdf
Item Status:	Filed
Status Date:	05/02/2024
Satisfied - Item:	Exhibit SCS
Comments:	
Attachment(s):	Exhibit SCS.pdf

Item Status:	Filed
Status Date:	05/02/2024
Satisfied - Item:	Current vs Proposed Marked Up Manual
Comments:	
Attachment(s):	[Compare Report] OH071MH-A.pdf
Item Status:	Filed
Status Date:	05/02/2024
Satisfied - Item:	Policies Impacted by Increased Deductibles
Comments:	
Attachment(s):	Deductible Impacted Policies - Ohio Manufactured Home.pdf
Item Status:	Filed
Status Date:	05/02/2024

## 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)
04/18/2024	Superseded/With drawn 05/02/2024	Supporting Document	Current vs Proposed Marked Up Manual	04/23/2024	Manual Mark Up Compare.pdf (Superceded)
02/13/2024	Superseded/With drawn 05/02/2024	Supporting Document	Filing Requirements Summary - P&C	04/18/2024	Exhibit B - Rate Impacts.pdf (Superceded) Exhibit C - Actuarial Indication Support.pdf OH MH Deductible Factors.pdf OH MH Water Factors.pdf Profit Loss Statement MH - CW.pdf Profit Loss Statement MH - OH.pdf