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User Usage Agreement Attachments

Usage Agreement	Usage Agreement.pdf

Rate-Rule Attachments	(ex. Document Name	Attachment Name)
Rate Manual - Washington		Renters Program Rate Manual (WA 2026-03).pdf
Territory Manual - Washington		Blink Renters Program Territory Manual (WA 2024-11).pdf
Rule Manual		Renters Program Rule Manual (WA 2026-03).pdf
Payment Rules - Washington		Blink Renters Payment Rules (WA 2024-11).pdf
Coverage Rules - Washington		Blink Renters Coverage Rules (WA 2025-02).pdf
Notice Rules		Blink Renters Notice & Disclosure Rules (CW 2025-02).pdf
Affinity Partners		Renters Program Affinity Group List (WA 2026-03).pdf
Rate Manual - Washington		*Renters Program Rate Manual (WA 2025-11).pdf*
Rate Manual - Washington		*Program Rate Manual (WA 2025-09).pdf*
Rate Manual - Washington		*Renters Program Rate Manual (WA 2025-05).pdf*
Rate Manual - Washington		*Blink Renters Program Rate Manual (WA 2024-11).pdf*
Rule Manual		*Renters Program Rule Manual (WA 2026-03) (1).pdf*
Rule Manual		*Renters Program Rule Manual (CW 2026-02).pdf*
Rule Manual		*Blink Renters Program Rule Manual (CW 2025-02).pdf*
Affinity Partners		*Renters Program Affinity Partners (CW 2026-03).pdf*

Supporting Document Attachments	(ex. Supporting Document Name	Attachment Name)
Explanatory Memorandum		Blink Renters Explanatory Memorandum (RR).pdf
Actuarial Memorandum and ROE Exhibits		Chubb Blink Renters Program - Actuarial Memorandum (RR - WA).pdf
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Rate Support	*Rate Support (WA) (1).pdf*
Rate Support	*Rate Support (WA) (2).pdf*
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Renters Program Rate Manual - Redline	Renters Program Rate Manual (WA 2025-11) (redlined).pdf
Renters Program Rate Manual - Redline	*Program Rate Manual (WA 2025-09) redline.pdf*
Renters Program Rate Manual - Redline	*Renters Program Rate Manual (WA 2025-05) redlined.pdf*
Copy of Filings in Response to the 10/3/2025 Objection Letter	(19) American Bankers Insurance Company of Florida - WA SERFF #ASPX-125684917.pdf
Copy of Filings in Response to the 10/3/2025 Objection Letter	(14) AmGUARD Insurance Company - WA SERFF #AMGD-133833518 part 1.pdf
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Renters Program Rule Manual - Redline	Renters Program Rule Manual (CW 2026-02)_redline.pdf
Renters Program Rate Manual - Redline	Renters Program Rate Manual (WA 2026-03)_redline.pdf
Renters Program Rule Manual - Redline	Renters Program Rule Manual (WA 2026-03)_redline.pdf

Filing at a Glance

Company:	ACE Property and Casualty Insurance Company
Product Name:	Homeowners - Tenant
State:	Washington
TOI:	04.0 Homeowners
Sub-TOI:	04.0004 Tenant Homeowners
Filing Type:	Rate/Rule
Date Submitted:	02/27/2025
SERFF Tr Num:	ACEH-134438705
SERFF Status:	Closed-Approved
State Tr Num:	481144
State Status:	Approved
Co Tr Num:	WA 24 2997380 BLINK - R/R
Effective Date Requested (New):	03/01/2026
Effective Date Requested (Renewal):	
Author(s):	Jade McDermott, Stephanie Rivera
Reviewer(s):	Maddie Knudsvig (primary)
Disposition Date:	02/13/2026
Disposition Status:	Approved
Effective Date (New):	03/01/2026
Effective Date (Renewal):	
Destruction Date:	

General Information

Project Name: BLINK Renters Protection Program
Project Number: WA 24 2997380 BLINK
Reference Organization:
Reference Title:
Filing Status Changed: 02/13/2026
State Status Changed: 02/13/2026
Created By: Jade McDermott
Corresponding Filing Tracking Number: ACEH-134438640

Status of Filing in Domicile:
Domicile Status Comments:
Reference Number:
Advisory Org. Circular:

Deemer Date:
Submitted By: Jade McDermott

Filing Description:
Chubb is introducing a new insurance program called Blink® Renters Protection.

The product will be used to help satisfy the basic insurance needs for tenants through a base HO4-like policy with limit enhancement options. The product also optionally includes addon coverages designed to meet the lifestyle needs of renters.

This program is being developed nationally and will be marketed through three distribution channels: direct to consumer, digital retail agents and the specialty channel. The specialty channel is designed for the multi-housing, managed single family rental industries as well as financial institutions catering to renters. The initial focus will be through the specialty channel.

A detailed Explanatory Memorandum has been included to assist in your review.

Company and Contact

Filing Contact Information

Jade McDermott, State Filings Analyst
202 Hall's Mill Road
P.O. Box 1650
Whitehouse Station, NJ 08854

jlmcdermott@chubb.com
908-572-4429 [Phone]
908-572-4820 [FAX]

Filing Company Information

ACE Property and Casualty Insurance Company
PO Box 1000
436 Walnut Street
Philadelphia, PA 19106
(215) 640-1811 ext. [Phone]

CoCode: 20699
Group Code: 626
Group Name: Chubb
FEIN Number: 06-0237820

State of Domicile: Pennsylvania
Company Type: Stock
State ID Number: 13

Filing Fees

State Fees

Fee Required?	No
Retaliatory?	No
Fee Explanation:	

State Specific

Is the Co Tracking # field populated on the General Information Tab? (yes/no): N/A
Form Tab Only - Are the Form # and Form Description fields populated corresponding to the attached form? (yes/no): N/A

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Maddie Knudsvig	02/13/2026	02/13/2026

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Active Suspense	Maddie Knudsvig	02/11/2026	02/11/2026
Active Suspense	Maddie Knudsvig	02/09/2026	02/09/2026
Active Suspense	Maddie Knudsvig	12/18/2025	12/18/2025
Active Suspense	Maddie Knudsvig	10/08/2025	10/08/2025
Active Suspense	Maddie Knudsvig	10/03/2025	10/03/2025
Active Suspense	Maddie Knudsvig	07/21/2025	07/21/2025
Active Suspense	Maddie Knudsvig	03/25/2025	03/25/2025

Response Letters

Responded By	Created On	Date Submitted
Jade McDermott	02/12/2026	02/12/2026
Jade McDermott	02/10/2026	02/10/2026
Jade McDermott	02/05/2026	02/05/2026
Jade McDermott	11/17/2025	11/17/2025
Jade McDermott	10/06/2025	10/06/2025
Jade McDermott	09/19/2025	09/19/2025
Jade McDermott	06/03/2025	06/03/2025

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Extension	Note To Filer	Maddie Knudsvig	05/27/2025	05/27/2025
Extension Request	Note To Reviewer	Jade McDermott	05/23/2025	05/23/2025

Disposition

Disposition Date: 02/13/2026
Effective Date (New): 03/01/2026
Effective Date (Renewal):
Status: Approved

Comment: We would appreciate you taking part in our online customer survey. This survey is voluntary and confidential and though not all information is required, providing the respective filing number on the last question will help us improve the quality of our services. Please take a minute or two to give us your feedback so we can better serve you.

Take the survey at: http://www.sesrc.wsu.edu/PugetSound/RatesandForms

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate (revised)	Rate Manual - Washington		Yes
Rate	Territory Manual - Washington		Yes
Rate (revised)	Rule Manual		Yes
Rate	Payment Rules - Washington		Yes
Rate	Coverage Rules - Washington		Yes
Rate	Notice Rules		Yes
Rate (revised)	Affinity Partners		Yes
Rate	Rate Manual - Washington		Yes
Rate	Rate Manual - Washington		Yes
Rate	Rate Manual - Washington		Yes
Rate	Rate Manual - Washington		Yes
Rate	Rule Manual		Yes
Rate	Rule Manual		Yes
Rate	Rule Manual		Yes
Rate	Affinity Partners		Yes
Supporting Document	Explanatory Memorandum		Yes
Supporting Document	Actuarial Memorandum and ROE Exhibits		Yes
Supporting Document (revised)	Rate Support		Yes

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Rate Support		Yes
Supporting Document	Rate Support		Yes
Supporting Document	Rate Support		Yes
Supporting Document	Rate Support		Yes
Supporting Document	Rate Support		Yes
Supporting Document (revised)	Renters Program Rate Manual - Redline		Yes
Supporting Document	Renters Program Rate Manual - Redline		Yes
Supporting Document	Renters Program Rate Manual - Redline		Yes
Supporting Document	Copy of Filings in Response to the 10/3/2025 Objection Letter		Yes
Supporting Document	Renters Program Rule Manual - Redline		Yes
Supporting Document	Renters Program Rate Manual - Redline		Yes
Supporting Document	Renters Program Rule Manual - Redline		Yes

Objection Letter

Objection Letter Status	Active Suspense
Objection Letter Date	02/11/2026
Submitted Date	02/11/2026
Respond By Date	

Dear Jade McDermott,

Introduction:

SUSPENSE DATE: April 13, 2026

We have reviewed your response of February 10, 2026 and continue holding your filing as disapproved under the provisions of RCW 48.19.100. Please respond to the following concerns:

Objection 1

Comments: 1.Your proposed rule reads, To be eligible for the Affinity credit, the named insured maintains an account with that affinity partner, a membership within an approved group, or an affinity discount code is provided, and purchases the policy through an applicable marketing plan. The list of available programs is included in Renters Protection Program Affinity Partners list. The credit may be marketed as [Partner] Discount. Please address the following:

A.Some of this language is ambiguous. You refer to both an affinity partner and approved group. Also, it is unclear what the affinity discount code is. Are all policyholders required to provide this? Your rule must be clear.

B.You state the policy must be purchased through an applicable marketing plan. It is unclear what this is. It appears you may be combining a binding channel discount and an affinity discount. We recommend you remove this.

C.You must provide a complete list of groups your company considers to be approved affinity groups. Note that you must file to update this list every time groups are added or removed. The updated list must be filed before the discount can be applied to new groups.

D.Please confirm that there are no insurance entities in the list; we do not accept insurance agents, agencies, or other entities in the insurance industry in this type of list.

Conclusion:

We encourage you to respond promptly to these concerns. If we do not receive your response by April 13, 2026, your filing will be closed, and we will reconsider it only if you resubmit it as a new filing.

Madeline Knudsvig
(360)725-7115

Sincerely,

Maddie Knudsvig

Objection Letter

Objection Letter Status	Active Suspense
Objection Letter Date	02/09/2026
Submitted Date	02/09/2026
Respond By Date	

Dear Jade McDermott,

Introduction:

SUSPENSE DATE: April 10, 2026

We have reviewed your response of February 5, 2026 and continue holding your filing as disapproved under the provisions of RCW 48.19.100. Please respond to the following concern:

Objection 1

Comments: 1.Please address the following regarding our proposed Program Modifier Factors:
a.For your proposed Verified Customer factor you reference a part of a competitors schedule rating plan that is not approved, as there is a Washington exception removing it. Please provide another form of support for your proposal.
b.Your proposed Verified Customer rule reads, To be eligible for the Verified Customer credit, banking and financial partners will verify the customer identity and standing through a financial relationship and anti-money laundering protocols. This is still ambiguous. Who are the banking and financial partners? Why are they verifying the customer identity and not the company? What standing are they verifying? Your rules must be revised to be specific, objective, and mutually exclusive. If, by application of the criteria, the examiner could clearly identify the one appropriate rate level for any particular risk, then you have been successful in writing your rules.

Conclusion:

We encourage you to respond promptly to this concern. If we do not receive your response by April 10, 2026, your filing will be closed, and we will reconsider it only if you resubmit it as a new filing.

Madeline Knudsvig
(360)725-7115

Sincerely,
Maddie Knudsvig

Objection Letter

Objection Letter Status	Active Suspense
Objection Letter Date	12/18/2025
Submitted Date	12/18/2025
Respond By Date	

Dear Jade McDermott,

Introduction:

SUSPENSE DATE: February 16, 2026

We have reviewed your response of November 14, 2025 and continue holding your filing as disapproved under the provisions of RCW 48.19.100. Please respond to the following concern:

Objection 1

Comments: 1.It is still unclear where you have supported your Program Modifier factors. Also, your rules must be revised to be specific, objective, and mutually exclusive. If, by application of the criteria, the examiner could clearly identify the one appropriate rate level for any particular risk, then you have been successful in writing your rules. You may find our speed-to-market tool regarding class definitions helpful. It can be found here: https://www.insurance.wa.gov/insurers-regulated-entities/rate-and-form-filing/rate-filing-speed-market-tools-property-and-casualty-companies.

Conclusion:

We encourage you to respond promptly to this concern. If we do not receive your response by February 16, 2026, your filing will be closed, and we will reconsider it only if you resubmit it as a new filing.

Madeline Knudsvig
(360)725-7115

Sincerely,

Maddie Knudsvig

Objection Letter

Objection Letter Status	Active Suspense
Objection Letter Date	10/08/2025
Submitted Date	10/08/2025
Respond By Date	

Dear Jade McDermott,

Introduction:

SUSPENSE DATE: December 8, 2025

We have reviewed your response of October 6, 2025 and continue holding your filing as disapproved under the provisions of RCW 48.19.100. Please respond to the following concern:

Objection 1

Comments: 1.Please address the following regarding your proposed rates:

a.We are not locating where you have supported some of your rates still. For example, the Emergency Services rates.

b.Some of your proposed selections are higher than your competitor comparison supports. Please revise accordingly. Examples are listed below.:

i.Debris Removal

ii.Additional Living Expenses

iii.Credit Card $25,000 and $50,000 limits

iv.Valued Items

Conclusion:

We encourage you to respond promptly to this concern. If we do not receive your response by December 8, 2025, your filing will be closed, and we will reconsider it only if you resubmit it as a new filing.

Madeline Knudsvig

(360)725-7115

Sincerely,

Maddie Knudsvig

Objection Letter

Objection Letter Status	Active Suspense
Objection Letter Date	10/03/2025
Submitted Date	10/03/2025
Respond By Date	

Dear Jade McDermott,

Introduction:

SUSPENSE DATE: December 2, 2025

We have reviewed your response of September 19, 2025 and continue holding your filing as disapproved under the provisions of RCW 48.19.100. Please respond to the following concern:

Objection 1

Comments: 1.We are still having trouble locating some of the competitor filings you listed. For example, AMGD-133835518 and ASPX-125684917. Are these beyond our retention window? If so, please provide a copy of the filing. Note, we would not accept the use of rates filed in other states as support for your proposed rates. Since those rates have not been filed in Washington, there is no basis for assuming that they are actuarially sound in compliance with Washington filing law. Please address all instances such as this.

Conclusion:

We encourage you to respond promptly to this concern. If we do not receive your response by December 2, 2025, your filing will be closed, and we will reconsider it only if you resubmit it as a new filing.

Madeline Knudsvig
(360)725-7115

Sincerely,

Maddie Knudsvig

Objection Letter

Objection Letter Status	Active Suspense
Objection Letter Date	07/21/2025
Submitted Date	07/21/2025
Respond By Date	

Dear Jade McDermott,

Introduction:

SUSPENSE DATE: September 19, 2025

We have reviewed your response of June 3, 2025 and continue holding your filing as disapproved under the provisions of RCW 48.19.100. Please respond to the following concern:

Objection 1

Comments: 1.We are having trouble locating some of the competitor filings you listed. For example, ALSE-133713895 and A MMA-133513924. Are these beyond our retention window? If so, please provide a copy of the filing. Note, we would not accept the use of rates filed in other states as support for your proposed rates. Since those rates have not been filed in Washington, there is no basis for assuming that they are actuarially sound in compliance with Washington filing law. Please address all instances such as this.

Conclusion:

We encourage you to respond promptly to this concern. If we do not receive your response by September 19, 2025, your filing will be closed, and we will reconsider it only if you resubmit it as a new filing.

Madeline Knudsvig
(360)725-7115

Sincerely,

Maddie Knudsvig

Objection Letter

Objection Letter Status	Active Suspense
Objection Letter Date	03/25/2025
Submitted Date	03/25/2025
Respond By Date	

Dear Jade McDermott,

Introduction:

SUSPENSE DATE May 26, 2025

We are holding your filing as disapproved under the provisions of RCW 48.19.100. Please respond to the following concerns:

Objection 1

Comments: 1.Have the competitor rates you show in your supporting exhibit been adjusted for difference in company expenses? If not, please do so. Without such an analysis, we do not see how you can be assured that your rates will comply with RCW 48.19.020 for your company.

Objection 2

Comments: 2.It appears you are using industry expense data. Do you have Washington data for a similar program or countrywide data for this program instead?

Objection 3

Comments: 3.Your selected commission expense appears to be higher than the industry data supports. Is this a contracted rate?

Objection 4

Comments: 4.Please provide support for your proposed Enhancement option rates.

Conclusion:

We encourage you to respond promptly to these concerns. If we do not receive your response by May 26, 2025, your filing will be closed, and we will reconsider it only if you resubmit it as a new filing.

Madeline Knudsvig
(360)725-7115

Sincerely,

Maddie Knudsvig

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	02/12/2026
Submitted Date	02/12/2026

Dear Maddie Knudsvig,

Introduction:

This is in response to your Objection Letter of 2/11/2026.

Response 1

Comments:

A.We have tried to make the language clearer and removed the discount code.
B.We have done so.
C.We have included such a list and will seek filing approval before applying the discount in the future.
D.We have updated the list as such. At this time there are no groups listed but plan to add so in the future.

Related Objection 1

Comments: 1.Your proposed rule reads, To be eligible for the Affinity credit, the named insured maintains an account with that affinity partner, a membership within an approved group, or an affinity discount code is provided, and purchases the policy through an applicable marketing plan. The list of available programs is included in Renters Protection Program Affinity Partners list. The credit may be marketed as [Partner] Discount. Please address the following:
A.Some of this language is ambiguous. You refer to both an affinity partner and approved group. Also, it is unclear what the affinity discount code is. Are all policyholders required to provide this? Your rule must be clear.
B.You state the policy must be purchased through an applicable marketing plan. It is unclear what this is. It appears you may be combining a binding channel discount and an affinity discount. We recommend you remove this.
C.You must provide a complete list of groups your company considers to be approved affinity groups. Note that you must file to update this list every time groups are added or removed. The updated list must be filed before the discount can be applied to new groups.
D.Please confirm that there are no insurance entities in the list; we do not accept insurance agents, agencies, or other entities in the insurance industry in this type of list.

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	Rule Manual	BRP-RULES-WA-1 through WA-3 2026-03	New		02/12/2026 By: Jade McDermott
Previous Version					
1	*Rule Manual*	*BRP-RULES-WA-1 through WA-3 2026-03*	*New*		*02/10/2026 By: Jade McDermott*
Previous Version					
1	*Rule Manual*	*BRP-RULES-CW-1 through CW-3 2026-02*	*New*		*02/05/2026 By: Jade McDermott*
Previous Version					
1	*Rule Manual*	*BRP-RULES-CW-1 through CW-3 2025-02*	*New*		*02/27/2025 By: Jade McDermott*
2	Affinity Partners	BRP-RULES-WA-1 2026-03	New		02/12/2026 By: Jade McDermott
Previous Version					
2	*Affinity Partners*	*BRP-RULES-CW-1 2026-03*	*New*		*02/10/2026 By: Jade McDermott*

No Supporting Documents changed.

Conclusion:

We trust this additional information will place you in a position to approve our filing.

Sincerely,

Jade McDermott

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	02/10/2026
Submitted Date	02/10/2026

Dear Maddie Knudsvig,

Introduction:

This is in response to your Objection Letter of 2/9/2026.

Response 1

Comments:

We have removed the Verified Customer factor, rule requirements and support and have introduced an Affinity factor substantially similar to 481. PARTNER DISCOUNTS Non-Auto Partner Affinity Discounts rate and rule criteria from Homesite Insurance Company of the Midwest Rate/Rule approved 08/28/2025 in Washington under SERFF filing number: HMSS-134386728.

Related Objection 1

Comments: 1.Please address the following regarding our proposed Program Modifier Factors:
a.For your proposed Verified Customer factor you reference a part of a competitors schedule rating plan that is not approved, as there is a Washington exception removing it. Please provide another form of support for your proposal.
b.Your proposed Verified Customer rule reads, To be eligible for the Verified Customer credit, banking and financial partners will verify the customer identity and standing through a financial relationship and anti-money laundering protocols. This is still ambiguous. Who are the banking and financial partners? Why are they verifying the customer identity and not the company? What standing are they verifying? Your rules must be revised to be specific, objective, and mutually exclusive. If, by application of the criteria, the examiner could clearly identify the one appropriate rate level for any particular risk, then you have been successful in writing your rules.

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	Rate Manual - Washington	BRP-RATES-WA-1 through WA-5 2026-03	New		02/10/2026 By: Jade McDermott
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2025-11*	*New*		*11/17/2025* *By: Jade McDermott*
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2025-09*	*New*		*09/19/2025* *By: Jade McDermott*
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2025-05*	*New*		*06/03/2025* *By: Jade McDermott*
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2024-11*	*New*		*02/27/2025* *By: Jade McDermott*
2	Rule Manual	BRP-RULES-WA-1 through WA-3 2026-03	New		02/10/2026 By: Jade McDermott
Previous Version					
2	*Rule Manual*	*BRP-RULES-CW-1 through CW-3 2026-02*	*New*		*02/05/2026* *By: Jade McDermott*
Previous Version					
2	*Rule Manual*	*BRP-RULES-CW-1 through CW-3 2025-02*	*New*		*02/27/2025* *By: Jade McDermott*
3	Affinity Partners	BRP-RULES-CW-1 2026-03	New		02/10/2026 By: Jade McDermott

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
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Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
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Satisfied - Item:	*Rate Support*
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Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Satisfied - Item:	Renters Program Rate Manual - Redline
Comments:	
Attachment(s):	Renters Program Rate Manual (WA 2026-03)_redline.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
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Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Satisfied - Item:	Renters Program Rate Manual - Redline
Comments:	
Attachment(s):	Renters Program Rate Manual (WA 2026-03)_redline.pdf

Satisfied - Item:	Renters Program Rule Manual - Redline
Comments:	
Attachment(s):	Renters Program Rule Manual (WA 2026-03)_redline.pdf

Conclusion:

Thank you for your continued review of our filing.

Sincerely,

Jade McDermott

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	02/05/2026
Submitted Date	02/05/2026

Dear Maddie Knudsvig,

Introduction:

This is in response to your Objection Letter of 12/18/2025.

Response 1

Comments:

The program modifier factors are based on the following filings:

1.The Preferred Property is based on the same factor in Markel American Insurance Companys SERFF #MRKA-128534366.
2.The Safe Property Factor is based on the Protective Devices discounts in Farmers Group Property and Casualty Insurance Companys SERFF #FAIG-134263809
3.The Verified Customer Factor is based on the Know Your Customer Factor in XL Specialty Insurance Companys SERFF #XLAM-134451965.

We have updated the Washington rate support file accordingly (file Rate Support (WA)). We have also revised the criteria in the rules manual to be mutually exclusive / objective.

Related Objection 1

Comments: 1.It is still unclear where you have supported your Program Modifier factors. Also, your rules must be revised to be specific, objective, and mutually exclusive. If, by application of the criteria, the examiner could clearly identify the one appropriate rate level for any particular risk, then you have been successful in writing your rules. You may find our speed-to-market tool regarding class definitions helpful. It can be found here: https://www.insurance.wa.gov/insurers-regulated-entities/rate-and-form-filing/rate-filing-speed-market-tools-property-and-casualty-companies.

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	Rule Manual	BRP-RULES-CW-1 through CW-3 2026-02	New		02/05/2026 By: Jade McDermott
Previous Version					
1	*Rule Manual*	*BRP-RULES-CW-1 through CW-3 2025-02*	*New*		*02/27/2025 By: Jade McDermott*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Satisfied - Item:	Renters Program Rule Manual - Redline
Comments:	
Attachment(s):	Renters Program Rule Manual (CW 2026-02)_redline.pdf

Conclusion:

We have sent a Post-Submission Update to amend our effective date to 3/1/2026. Thank you for your continued review of our filing.

Sincerely,

Jade McDermott

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	11/17/2025
Submitted Date	11/17/2025

Dear Maddie Knudsvig,

Introduction:

This is in response to your Objection Letter of 10/8/2025.

Response 1

Comments:

1a. Emergency Services Charge was previously listed under Fire Department Services Charge. We have updated the label on the competitor comparison. All competitor filings used are referenced in the footnotes at the bottom of the rate support document. Please see Rate Support (WA).

1b. Please see the attached revised manual and rate support documents with revised selections. We have selected rates in between all the competitor expense adjusted rates/factors.

Related Objection 1

Comments: 1.Please address the following regarding your proposed rates:
a.We are not locating where you have supported some of your rates still. For example, the Emergency Services rates.
b.Some of your proposed selections are higher than your competitor comparison supports. Please revise accordingly. Examples are listed below.:
i.Debris Removal
ii.Additional Living Expenses
iii.Credit Card $25,000 and $50,000 limits
iv.Valued Items

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	Rate Manual - Washington	BRP-RATES-WA-1 through WA-5 2025-11	New		11/17/2025 By: Jade McDermott
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2025-09*	*New*		*09/19/2025* *By: Jade McDermott*
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2025-05*	*New*		*06/03/2025* *By: Jade McDermott*
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2024-11*	*New*		*02/27/2025* *By: Jade McDermott*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Satisfied - Item:	Renters Program Rate Manual - Redline
Comments:	
Attachment(s):	Renters Program Rate Manual (WA 2025-11) (redlined).pdf
Previous Version	
Satisfied - Item:	*Renters Program Rate Manual - Redline*
Comments:	
Attachment(s):	*Program Rate Manual (WA 2025-09) redline.pdf*
Previous Version	
Satisfied - Item:	*Renters Program Rate Manual - Redline*
Comments:	
Attachment(s):	*Renters Program Rate Manual (WA 2025-05) redlined.pdf*

Conclusion:

We trust this additional information will place you in a position to further consider our filing.

Sincerely,

Jade McDermott

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	10/06/2025
Submitted Date	10/06/2025

Dear Maddie Knudsvig,

Introduction:

This is in response to your Objection Letter of 10/3/2025.

Response 1

Comments:

Thank you. Yes, it appears those two filings are beyond the retention window. We are enclosing copies of those two WA filings for your review. Please note the AmGUARD filing had to be split into two parts due to SERFF size limitations.

Related Objection 1

Comments: 1.We are still having trouble locating some of the competitor filings you listed. For example, AMGD-133835518 and ASPX-125684917. Are these beyond our retention window? If so, please provide a copy of the filing. Note, we would not accept the use of rates filed in other states as support for your proposed rates. Since those rates have not been filed in Washington, there is no basis for assuming that they are actuarially sound in compliance with Washington filing law. Please address all instances such as this.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Copy of Filings in Response to the 10/3/2025 Objection Letter
Comments:	
Attachment(s):	(19) American Bankers Insurance Company of Florida - WA SERFF #ASPX-125684917.pdf (14) AmGUARD Insurance Company - WA SERFF #AMGD-133833518 part 1.pdf (14) AmGUARD Insurance Company - WA SERFF #AMGD-133833518 part 2.pdf

Conclusion:

Thank you for your continued review of our filing.

Sincerely,

Jade McDermott

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	09/19/2025
Submitted Date	09/19/2025

Dear Maddie Knudsvig,

Introduction:

This is in response to your Objection Letter of 7/21/2025.

Response 1

Comments:

Please see the attached revised support, which has been updated to reference only programs approved in Washington. All previous references to filings outside of Washington have been removed to ensure the support aligns with Washington filing requirements. We have also updated the rate manual and included a redline version to assist in your review. We are sending a Post-Submission Update to amend the effective date to 11/1/2025.

Related Objection 1

Comments: 1.We are having trouble locating some of the competitor filings you listed. For example, ALSE-133713895 and A MMA-133513924. Are these beyond our retention window? If so, please provide a copy of the filing. Note, we would not accept the use of rates filed in other states as support for your proposed rates. Since those rates have not been filed in Washington, there is no basis for assuming that they are actuarially sound in compliance with Washington filing law. Please address all instances such as this.

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	Rate Manual - Washington	BRP-RATES-WA-1 through WA-5 2025-09	New		09/19/2025 By: Jade McDermott
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2025-05*	*New*		*06/03/2025 By: Jade McDermott*
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2024-11*	*New*		*02/27/2025 By: Jade McDermott*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Satisfied - Item:	Renters Program Rate Manual - Redline
Comments:	
Attachment(s):	Program Rate Manual (WA 2025-09) redline.pdf
Previous Version	
Satisfied - Item:	*Renters Program Rate Manual - Redline*
Comments:	
Attachment(s):	*Renters Program Rate Manual (WA 2025-05) redlined.pdf*

Conclusion:

Thank you for your continued review of our filing.

Sincerely,

Jade McDermott

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	06/03/2025
Submitted Date	06/03/2025

Dear Maddie Knudsvig,

Introduction:

This is in response to your Objection Letter of 3/25/2025.

Response 1

Comments:

We have updated the rate manual and rate support to adjust rates based on company expenses.

Related Objection 1

Comments: 1.Have the competitor rates you show in your supporting exhibit been adjusted for difference in company expenses? If not, please do so. Without such an analysis, we do not see how you can be assured that your rates will comply with RCW 48.19.020 for your company.

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	Rate Manual - Washington	BRP-RATES-WA-1 through WA-5 2025-05	New		06/03/2025 By: Jade McDermott
Previous Version					
1	*Rate Manual - Washington*	*BRP-RATES-WA-1 through WA-5 2024-11*	*New*		*02/27/2025 By: Jade McDermott*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Previous Version	
Satisfied - Item:	*Rate Support*
Comments:	
Attachment(s):	*Rate Support (WA).pdf*

Satisfied - Item:	Renters Program Rate Manual - Redline
Comments:	
Attachment(s):	Renters Program Rate Manual (WA 2025-05) redlined.pdf

Response 2

Comments:

The Company doesnt have any historical 4.0 Homeowners premium or expenses in Washington or Countrywide so we cant base the expense selections on company data (the filed annual statements have $0 for premium, expenses, and losses for CY 2021 through CY 2024). For this reason, we have to base the expenses on industry data

Related Objection 2

Comments: 2.It appears you are using industry expense data. Do you have Washington data for a similar program or countrywide data for this program instead?

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 3

Comments:

We are in the process of negotiating commissions with multiple producers and expect our contracted commissions to be higher than industry average and in the range of Markel American Ins. Co. and Technology Ins. Co.

Related Objection 3

Comments: 3.Your selected commission expense appears to be higher than the industry data supports. Is this a contracted rate?

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 4

Comments:

We have included a competitor based expense adjusted support on page 1 of Rate Support (WA) within the Supporting Documentation.

Related Objection 4

Comments: 4.Please provide support for your proposed Enhancement option rates.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

We trust this additional information will place you in a position to further consider our filing.

Sincerely,

Jade McDermott

Note To Filer

Created By:

Maddie Knudsvig on 05/27/2025 07:01 PM

Last Edited By:

Kim Bauer

Submitted On:

03/02/2026 03:45 PM

Subject:

Extension

Comments:

We have granted you a two week extension. The revised suspense date is now June 9, 2025.

Madeline Knudsvig
(360)725-7115

Note To Reviewer

Created By:

Jade McDermott on 05/23/2025 11:55 AM

Last Edited By:

Kim Bauer

Submitted On:

03/02/2026 03:45 PM

Subject:

Extension Request

Comments:

We wish to request a two week extension in which to respond to your 3/25/2025 Objection Letter. Please advise if the extension is granted. Thank you for your consideration.

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		Rate Manual - Washington	BRP-RATES-WA-1 through WA-5 2026-03	New		Renters Program Rate Manual (WA 2026-03).pdf
2		Territory Manual - Washington	BRP-TERR-WA-1 2024-11	New		Blink Renters Program Territory Manual (WA 2024-11).pdf
3		Rule Manual	BRP-RULES-WA-1 through WA-3 2026-03	New		Renters Program Rule Manual (WA 2026-03).pdf
4		Payment Rules - Washington	BRP-RULES-WA-1 2024-11	New		Blink Renters Payment Rules (WA 2024-11).pdf
5		Coverage Rules - Washington	BRP-RULES-WA-1 2025-02	New		Blink Renters Coverage Rules (WA 2025-02).pdf
6		Notice Rules	BRP-RULES-CW-1 2025-02	New		Blink Renters Notice & Disclosure Rules (CW 2025-02).pdf
7		Affinity Partners	BRP-RULES-WA-1 2026-03	New		Renters Program Affinity Group List (WA 2026-03).pdf

Supporting Document Schedules

Satisfied - Item:	Explanatory Memorandum
Comments:	
Attachment(s):	Blink Renters Explanatory Memorandum (RR).pdf
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Memorandum and ROE Exhibits
Comments:	
Attachment(s):	Chubb Blink Renters Program - Actuarial Memorandum (RR - WA).pdf ACE PC Blink Renters ROE (CW).pdf
Item Status:	
Status Date:	

Satisfied - Item:	Rate Support
Comments:	
Attachment(s):	Rate Support (WA).pdf
Item Status:	
Status Date:	

Satisfied - Item:	Renters Program Rate Manual - Redline
Comments:	
Attachment(s):	Renters Program Rate Manual (WA 2025-11) (redlined).pdf
Item Status:	
Status Date:	

Satisfied - Item:	Copy of Filings in Response to the 10/3/2025 Objection Letter
Comments:	
Attachment(s):	(19) American Bankers Insurance Company of Florida - WA SERFF #ASPX-125684917.pdf (14) AmGUARD Insurance Company - WA SERFF #AMGD-133833518 part 1.pdf (14) AmGUARD Insurance Company - WA SERFF #AMGD-133833518 part 2.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Renters Program Rule Manual - Redline
Comments:	
Attachment(s):	Renters Program Rule Manual (CW 2026-02)_redline.pdf

Item Status:	
Status Date:	

Satisfied - Item:	Renters Program Rate Manual - Redline
Comments:	
Attachment(s):	Renters Program Rate Manual (WA 2026-03)_redline.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Renters Program Rule Manual - Redline
Comments:	
Attachment(s):	Renters Program Rule Manual (WA 2026-03)_redline.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)
02/10/2026		Rate	Rule Manual	02/12/2026	Renters Program Rule Manual (WA 2026-03).pdf (Superceded)
02/10/2026		Rate	Affinity Partners	02/12/2026	Renters Program Affinity Partners (CW 2026-03).pdf (Superceded)
02/05/2026		Supporting Document	Rate Support	02/10/2026	Rate Support (WA).pdf (Superceded)
02/05/2026		Rate	Rule Manual	02/10/2026	Renters Program Rule Manual (CW 2026-02).pdf (Superceded)
11/17/2025		Supporting Document	Rate Support	02/05/2026	Rate Support (WA).pdf (Superceded)
11/17/2025		Rate	Rate Manual - Washington	02/10/2026	Renters Program Rate Manual (WA 2025-11).pdf (Superceded)
09/19/2025		Supporting Document	Rate Support	11/17/2025	Rate Support (WA).pdf (Superceded)
09/19/2025		Supporting Document	Renters Program Rate Manual - Redline	11/17/2025	Program Rate Manual (WA 2025-09) redline.pdf (Superceded)
09/19/2025		Rate	Rate Manual - Washington	11/17/2025	Program Rate Manual (WA 2025-09).pdf (Superceded)
06/03/2025		Rate	Rate Manual - Washington	09/19/2025	Renters Program Rate Manual (WA 2025-05).pdf (Superceded)
06/03/2025		Supporting Document	Rate Support	09/19/2025	Rate Support (WA).pdf (Superceded)
06/03/2025		Supporting Document	Renters Program Rate Manual - Redline	09/19/2025	Renters Program Rate Manual (WA 2025-05) redlined.pdf (Superceded)
02/27/2025		Supporting Document	Rate Support	06/03/2025	Rate Support (WA).pdf (Superceded)
02/27/2025		Rate	Rate Manual - Washington	06/03/2025	Blink Renters Program Rate Manual (WA 2024-11).pdf (Superceded)
02/27/2025		Rate	Rule Manual	02/05/2026	Blink Renters Program Rule Manual (CW 2025-02).pdf (Superceded)