State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

## **Table of Contents**

**User Usage Agreement** 

**Attachments** 

Usage Agreement.pdf

Usage Agreement.pdf

Rate-Rule Attachments (ex. Document Name Attachment Name)

Driver Quality Factor TM 2.0 DQF Rule 08 24\_OH.pdf

Driver Quality Factor TM 2.0 DQF Rule 08 24.pdf

Rule 24. Truckers / Motor Carriers TM 2.0 Rule 24.pdf

Rule 25. Premium Development - TM 2.0 Rule 25 10 24.pdf

Zone Rated Autos

Weighted Average Radius / Zone TM 2.0 WA Rule 10 24.pdf

Rule

Violation Category Mapping Table SmallTrucking - DQF Violation Mapping\_CW\_06 24.pdf

Company Loss Cost Multipliers Auto LCM Rule - OH 03 24.pdf

Rule 298. Deductible Insurance Auto Rule 298 - OH 03 24.pdf

Rule 23. Trucks, Tractors and Trailer Revised CA Rule 23 09-2023.pdf

Classifications

State Zone Loss Cost 03 24\_2 OH.pdf

Zip Code Zone Loss Cost 03 24\_2 OH.pdf

Rule 1. Application of this Division

Auto Rule 1 - OH Default with table.pdf

Underwriting Tiering Guidelines BSB Underwriting Tiering Guidelines 2.0 OH updated.pdf

Underwriting Tiering Guidelines BSB\_Underwriting Tiering Guidelines 2.0\_OH.pdf

Underwriting Tiering Guidelines <u>BSB\_Underwriting Tiering Guidelines 2.0.pdf</u>

**Supporting Document** (ex. Supporting Document Name Attachment Name)

**Attachments** 

Filing Requirements Summary - P&C Actuarial Memo - OH.pdf

Filing Requirements Summary - P&C FM OH RARUFM.pdf

Filing Requirements Summary - P&C Memorandum on BSB Zone Rating Loss Cost Calculation.pdf

Filing Requirements Summary - Actuarial Memo - OH.pdf

P&C

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

Filing Requirements Summary - P&C	FM OH RARUFM.pdf
Redline	TM 2.0 Rule 24 Redline 08 19 MU.pdf
Redline	TM 2.0 Rule 25 10 24 redline 08 19 MU.pdf
Redline	TM 2.0 WA Rule 10 24 redline 05 22 MU.pdf
Redline	TM 2.0 DQF Rule 08 24 redline from 09 22.pdf
Redline	BSB_Underwriting Tiering Guidelines 2.0_redline_from_20220706_as_of.pdf
Redline	Auto LCM Rule - OH 03 24 redline.pdf
Redline	Auto Rule 1 - OH Default with table_redline.pdf
Redline	Auto Rule 298 - OH 03 24 redline.pdf
Redline	SmallTrucking - DQF Violation Mapping_CW_06 24 redline from 09 22.pdf
LCM	OH - LC Adoption Form - Liab - Non-Zone-Rated P.pdf
LCM	OH - LC Adoption Form - Liab - Zone-Rated P.pdf
LCM	OH - LC Adoption Form - PD - Non-Zone-Rated P.pdf
LCM	OH - LC Adoption Form - PD - Zone-Rated P.pdf
Authorization Letter	Authorization Letter - BSB Trucking Model 2024 signed.pdf
Supporting Documentation	INS4012_CW.pdf
Supporting Documentation	INS4012_OH.pdf
Response Letter objection 3 and 4 from 07/12/2024	SERFF Response obj 3 and 4.pdf
Response letter - objection 07/31/2024	Responses_OH.pdf

SERFF Tracking #: BNIC-134120828 State Tracking #: BNIC-134120828

Company Tracking #: OH-CA-RARUFM-BSB

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# Filing at a Glance

Company: Berkley Casualty Company

Product Name: Small Business Transportation Program - Commercial Auto Coverages

State: Ohio

TOI: 20.0 Commercial Auto

Sub-TOI: 20.0000 Commercial Auto Combinations

Filing Type: Form/Rate/Rule
Date Submitted: 06/13/2024

SERFF Tr Num: BNIC-134120828
SERFF Status: Closed-FILED
State Tr Num: BNIC-134120828

State Status: FILED

Co Tr Num: OH-CA-RARUFM-BSB

Effective Date 12/15/2024

Requested (New):

Effective Date 12/15/2024

Requested (Renewal):

Author(s): Paula Rossman, Melissa Lovejoy, Ashley Allen Reviewer(s): Brad Wolfenbarger (primary), Stewart Trego

Disposition Date: 08/08/2024
Disposition Status: FILED
Effective Date (New): 12/15/2024
Effective Date (Renewal): 12/15/2024

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **General Information**

Project Name: Status of Filing in Domicile: Pending

Project Number: Domicile Status Comments:

Reference Organization: Insurance Services Office ("ISO") Reference Number:
Reference Title: Advisory Org. Circular:

Filing Status Changed: 08/08/2024

State Status Changed: 08/08/2024 Deemer Date:

Created By: Paula Rossman Submitted By: Ashley Allen

Corresponding Filing Tracking Number:

State TOI: 20.0 Commercial Auto State Sub-TOI: 20.0000 Commercial Auto Combinations

Filing Description:

With this filing, Berkley Casualty Company (BCC) is amending the Commercial Auto Coverages under the following program as described below.

Berkley Casualty Company - Small Business Transportation Program

BCC is a subscriber with the Insurance Services Office, Inc. (ISO) and had granted ISO filing authority on its behalf but has withdrawn that filing authority with ISO for Commercial Auto for the Small Business Transportation Program, and our intention is to non-adopt rates including loss costs, forms and rules for this program. The purpose of this submission is to introduce our new trucking model. We also will be amending our Loss Cost Multipliers for an overall rate change of 0%.

We respectfully request to implement this revision for all new and renewal policies effective on or after November 1, 2024.

Enclosed is authorization for Perr&Knight to submit this filing on behalf of the Company. All correspondence related to this filing should be directed to Perr&Knight. If there are any requests for additional information related to items prepared by the Company, we will forward the request immediately to the Company contact. The Company's response will be submitted to your attention as soon as we receive it.

# **Company and Contact**

#### **Filing Contact Information**

Paula Rossman, Fling Analyst III prossman@perrknight.com 401 Wilshire Blvd 310-893-0033 [Phone]

Santa Monica, CA 90401

## **Filing Company Information**

Berkley Casualty Company CoCode: 15911 State of Domicile: Iowa 11201 Douglas Ave. Group Code: 98 Company Type: Insurance

Urbandale, IA 53022 Group Name: W.R. Berkley State ID Number:

(800) 448-5621 ext. [Phone] FEIN Number: 63-0866690

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# Filing Fees

#### **State Fees**

Fee Required? Yes
Fee Amount: \$50.00
Retaliatory? No

Fee Explanation: \$50 per company

Per Company: Yes

Company	Amount	Date Processed	Transaction #
Berkley Casualty Company	\$50.00	06/13/2024 05:34 PM	288424696

EFT Total \$50.00

# **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

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Correspondence Summary**

**Dispositions** 

Status	Created By	Created On	Date Submitted
FILED	Brad Wolfenbarger	08/08/2024	08/08/2024

# **Objection Letters and Response Letters**

Objection Letters

Response L	etters
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Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Brad Wolfenbarger	07/31/2024	07/31/2024	Paula Rossman	08/06/2024	08/06/2024
Pending Industry Response	Brad Wolfenbarger	07/12/2024	07/12/2024	Paula Rossman	07/24/2024	07/24/2024

**Filing Notes** 

Subject	Note Type	Created By	Created On	Date Submitted
Effective date - Change Requested	Note To Reviewer	Paula Rossman	08/23/2024	08/23/2024
AA Reviewed	Reviewer Note	Brad Wolfenbarger	08/08/2024	
AA Sent Second Letter	Reviewer Note	Brad Wolfenbarger	07/31/2024	
AA Sent Letter	Reviewer Note	Brad Wolfenbarger	07/12/2024	

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI:20.0 Commercial Auto/20.0000 Commercial Auto CombinationsProduct Name:Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Disposition**

Disposition Date: 08/08/2024 Effective Date (New): 12/15/2024 Effective Date (Renewal): 12/15/2024

- Effective Date (New) changed from 11/01/2024 to 12/15/2024 and Effective Date (Renewal) changed from 11/01/2024 to 12/15/2024 by Wolfenbarger, Brad on

08/26/2024. 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	<b>Number of Policy</b>	Written	Maximum %	Minimum %
Company	Indicated	Rate	Change for	<b>Holders Affected</b>	Premium for	Change	Change
Name:	Change:	Impact:	this Program:	for this Program:	this Program:	(where reg'd):	(where reg'd):
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Schedule	Schedule Item	Schedule Item Status	<b>Public Access</b>
Rate (revised)	Driver Quality Factor	Filed	Yes
Rate	Driver Quality Factor	Superseded/Withdrawn	Yes
Rate	Rule 24. Truckers / Motor Carriers	Filed	Yes
Rate	Rule 25. Premium Development - Zone Rated Autos	Filed	Yes
Rate	Weighted Average Radius / Zone Rule	Filed	Yes
Rate	Violation Category Mapping Table	Filed	Yes
Rate	Company Loss Cost Multipliers	Filed	Yes
Rate	Rule 298. Deductible Insurance	Filed	Yes
Rate	Rule 23. Trucks, Tractors and Trailer Classifications	Filed	Yes
Rate	State Zone Loss Cost	Filed	Yes

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

Schedule	Schedule Item	Schedule Item Status	<b>Public Access</b>
Rate	Zip Code Zone Loss Cost	Filed	Yes
Rate	Rule 1. Application of this Division	Filed	Yes
Rate (revised)	Underwriting Tiering Guidelines	Filed	Yes
Rate	Underwriting Tiering Guidelines	Superseded/Withdrawn	Yes
Rate	Underwriting Tiering Guidelines	Superseded/Withdrawn	Yes
Supporting Document (revised)	Filing Requirements Summary - P&C	Filed	Yes
Supporting Document	Filing Requirements Summary - P&C	Superseded/Withdrawn	Yes
Supporting Document	Redline	Filed	Yes
Supporting Document	LCM	Filed	Yes
Supporting Document	Authorization Letter	Filed	Yes
Supporting Document	Supporting Documentation	Filed	Yes
Supporting Document	Response Letter objection 3 and 4 from 07/12/2024	Filed	Yes
Supporting Document	Response letter - objection 07/31/2024	Filed	Yes

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI:20.0 Commercial Auto/20.0000 Commercial Auto CombinationsProduct Name:Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Objection Letter**

Objection Letter Status Pending Industry Response

Objection Letter Date 07/31/2024
Submitted Date 07/31/2024
Respond By Date 08/14/2024

Dear Paula Rossman,

#### Introduction:

RESPOND BY: 08/14/2024

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

#### Objection 1

Comments: Regarding response 7 of the previous letter, provide further details regarding the review of the insured's IFTAs and inspection patterns for reasonability of the weighted average radius class. Explain what the IFTA is and how reviewing it can support the stated expected mileage within each radius class.

#### Objection 2

Comments: Provide further details around how and when the expected mileage within each radius classification can change or be updated for a particular vehicle. In particular, clarify whether the expected mileage within each radius can change

- 1.) On midterm amendment
- 2.) On audit
- 3.) On renewal or rewrite.

Revise and supersede as necessary.

#### Objection 3

Comments: The previous response to objection 4 is viewed as incomplete. The attached lift chart shows the lift using quintiles, but the factors vary down to the centile level.

Provide additional details and support for the specific tier factors. Include all data, methods, and assumptions used in selecting the tier factors.

#### Conclusion:

Sincerely,

Brad Wolfenbarger

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Objection Letter**

Objection Letter Status Pending Industry Response

Objection Letter Date 07/12/2024
Submitted Date 07/12/2024
Respond By Date 07/26/2024

Dear Paula Rossman,

#### Introduction:

RESPOND BY: 07/26/2024

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

#### Objection 1

Comments: Provide all company rate data by going to the Filing Correspondence tab and creating a Post-Submission Update. Under the Rate Information section, click "Yes" for Rate Info Applies and complete the rate data fields for:

Overall % Indicated Change

Overall % Rate Impact

Written Premium Change for this Program # of Policy Holders Affected for this Program

Written Premium for this Program

Be sure to include the SERFF Tracking Number of Last Filing, if applicable.

## Objection 2

Comments: As indicated in our Filing Requirements Summary, rate revisions should include the Property and Casualty Profit and Loss Statement, INS 4012 (copy in General Instructions), unless the information is provided in a similar format within the filing. Submit data for each company on both an Ohio and Countrywide basis. For Personal Auto, submit the data for Liability and Physical Damage coverages separately.

#### Objection 3

Comments: Provide support and documentation for the new state zone loss costs and state zip code loss costs.

## Objection 4

Comments: Provide support for the underwriting tier factors.

#### Objection 5

Comments: Provide support for the driver experience factors.

#### Objection 6

Comments: Provide support and documentation for the Number of Super & Major Violations Factors, Number of Minor Violations Factors, and Number of Other Administrative Violations Factors.

#### Objection 7

Comments: The expected mileage within each radius classification used in the weighted average radius/zone rule appears subjective and thus potentially unfairly discriminatory.

Provide a more detailed description regarding how the expected mileage within each radius is determined to demonstrate that the weighted average radius is determined in an objective, mutually exclusive, and exhaustive manner. Revise and supersede

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

accordingly.

#### **Objection 8**

Comments: The category of "Unknown" for Prior Carrier Length is viewed as potentially unfairly discriminatory since this should be a known quantity and "0" and "11+" are already available options.

Explain how a policyholder could be in the "Unknown" category or remove this as an option.

## Objection 9

Comments: The category of "Unknown" for Average Number of Relevant Claims is viewed as potentially unfairly discriminatory since this should be a known quantity and "0" is already an option.

Explain how a policyholder could be in the "Unknown" category or remove this as an option.

#### **Objection 10**

Comments: The category of "Missing" for Driver Experience is viewed as potentially unfairly discriminatory since this should be a known quantity.

Explain how a policyholder could be in the "Unknown" category or remove this as an option.

#### Conclusion:

Sincerely,

Brad Wolfenbarger

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Response Letter**

Response Letter Status Submitted to State

Response Letter Date 08/06/2024 Submitted Date 08/06/2024

Dear Brad Wolfenbarger,

Introduction:

#### Response 1

#### Comments:

Please see the attached response letter.

#### Related Objection 1

Comments: Regarding response 7 of the previous letter, provide further details regarding the review of the insured's IFTAs and inspection patterns for reasonability of the weighted average radius class. Explain what the IFTA is and how reviewing it can support the stated expected mileage within each radius class.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes			
Satisfied - Item:	Response letter - objection 07/31/2024		
Comments:			
Attachment(s):	Responses_OH.pdf		

# Response 2

#### Comments:

Please see the attached response letter.

## Related Objection 2

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

Comments: Provide further details around how and when the expected mileage within each radius classification can change or be updated for a particular vehicle. In particular, clarify whether the expected mileage within each radius can change

- 1.) On midterm amendment
- 2.) On audit
- 3.) On renewal or rewrite.

Revise and supersede as necessary.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

#### Response 3

#### Comments:

Please see the attached response letter.

Additionally weve updated our tiering guidelines to change the Unknown category for Average Number of Relevant Claims to Info Unavailable New business, as discussed with the DOI.

## Related Objection 3

Comments: The previous response to objection 4 is viewed as incomplete. The attached lift chart shows the lift using quintiles, but the factors vary down to the centile level.

Provide additional details and support for the specific tier factors. Include all data, methods, and assumptions used in selecting the tier factors.

## Changed Items:

No Form Schedule items changed.

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

Rate Schedule Item Changes						
Item				Previous State Filing		
No.	Exhibit Name	Rule # or Page #	Rate Action	Number	Date Submitted	
1	Underwriting Tiering Guidelines	Underwriting Tiering Guidelines	Replacement	BNIC-133371521	08/06/2024 By: Paula Rossman	
Previous Version						
1	Underwriting Tiering Guidelines	Underwriting Tiering Guidelines	Replacement	BNIC-133371521	07/24/2024 By: Paula Rossman	
Previous Version	Previous Version					
1	Underwriting Tiering Guidelines	Underwriting Tiering Guidelines	Replacement	BNIC-133371521	06/13/2024 By: Ashley Allen	

Supporting Document Schedule Item Changes			
Satisfied - Item:	Response letter - objection 07/31/2024		
Comments:			
Attachment(s):	Responses_OH.pdf		

#### Conclusion:

Should you have any further concerns, please do not hesitate to contact us.

Sincerely,

Paula Rossman

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Response Letter**

Response Letter Status Submitted to State

Response Letter Date 07/24/2024 Submitted Date 07/24/2024

Dear Brad Wolfenbarger,

Introduction:

#### Response 1

#### Comments:

A post-submission update has been submitted

#### Related Objection 1

Comments: Provide all company rate data by going to the Filing Correspondence tab and creating a Post-Submission Update. Under the Rate Information section, click "Yes" for Rate Info Applies and complete the rate data fields for:

Overall % Indicated Change

Overall % Rate Impact

Written Premium Change for this Program # of Policy Holders Affected for this Program

Written Premium for this Program

Be sure to include the SERFF Tracking Number of Last Filing, if applicable.

## Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

## Response 2

#### Comments:

Please see attached statements.

## Related Objection 2

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI:20.0 Commercial Auto/20.0000 Commercial Auto CombinationsProduct Name:Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

Comments: As indicated in our Filing Requirements Summary, rate revisions should include the Property and Casualty Profit and Loss Statement, INS 4012 (copy in General Instructions), unless the information is provided in a similar format within the filing. Submit data for each company on both an Ohio and Countrywide basis. For Personal Auto, submit the data for Liability and Physical Damage coverages separately.

#### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes				
Satisfied - Item:	Supporting Documentation			
Comments:				
Attachment(s):	INS4012_CW.pdf INS4012_OH.pdf			

## Response 3

#### Comments:

Please see the attached response letter and supporting documentation.

## Related Objection 3

Comments: Provide support and documentation for the new state zone loss costs and state zip code loss costs.

# Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

Supporting Document Schedule Item Changes					
Satisfied - Item:	Filing Requirements Summary - P&C				
Comments:					
Attachment(s):	Actuarial Memo - OH.pdf FM OH RARUFM.pdf Memorandum on BSB Zone Rating Loss Cost Calculation.pdf				
Previous Version					
Satisfied - Item:	Filing Requirements Summary - P&C				
Comments:					
Attachment(s):	Actuarial Memo - OH.pdf FM OH RARUFM.pdf				

Supporting Document Schedule Item Changes					
Satisfied - Item:	Filing Requirements Summary - P&C				
Comments:					
Attachment(s):	Actuarial Memo - OH.pdf FM OH RARUFM.pdf Memorandum on BSB Zone Rating Loss Cost Calculation.pdf				
Previous Version					
Satisfied - Item:	Filing Requirements Summary - P&C				
Comments:					
Attachment(s):	Actuarial Memo - OH.pdf FM OH RARUFM.pdf				

Satisfied - Item:	Response Letter objection 3 and 4 from 07/12/2024			
Comments:				
Attachment(s):	SERFF Response obj 3 and 4.pdf			

## Response 4

#### Comments:

Please see the attached response letter and supporting documentation

## Related Objection 4

Comments: Provide support for the underwriting tier factors.

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI:20.0 Commercial Auto/20.0000 Commercial Auto CombinationsProduct Name:Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes			
Satisfied - Item:	Supporting Documentation		
Comments:			
	INS4012_CW.pdf INS4012_OH.pdf		

Supporting Document Schedule Item Changes					
Satisfied - Item:	Supporting Documentation				
Comments:					
Attachment(s):	INS4012_CW.pdf INS4012_OH.pdf				
Satisfied - Item:	Response Letter objection 3 and 4 from 07/12/2024				
Comments:					
Attachment(s):	SERFF Response obj 3 and 4.pdf				

# Response 5

#### Comments:

As this is a new program, we did not have detailed enough internal information to derive our own factors related to driver experience and MVR violations. To stay consistent in the marketplace, we are adopting competitors filed factors. The factors remain the same as in our initial filing under SERFF tracking number BNIC-133371521.

#### Related Objection 5

Comments: Provide support for the driver experience factors.

## Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

## Response 6

#### Comments:

Please see our response to Objection 5.

#### Related Objection 6

Comments: Provide support and documentation for the Number of Super & Major Violations Factors, Number of Minor Violations Factors, and Number of Other Administrative Violations Factors.

## Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

#### Response 7

#### Comments:

This is a question we ask on our application, and our expectation is that the agent of the insured will be familiar with the insureds mileage/patterns of operations. We also may review the insureds IFTAs and pattern of inspections for reasonability in light of what is provided in the application.

## Related Objection 7

Comments: The expected mileage within each radius classification used in the weighted average radius/zone rule appears subjective and thus potentially unfairly discriminatory.

Provide a more detailed description regarding how the expected mileage within each radius is determined to demonstrate that the weighted average radius is determined in an objective, mutually exclusive, and exhaustive manner. Revise and supersede accordingly.

## Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

## Response 8

#### Comments:

We have removed Unknown category from the guidelines.

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI:20.0 Commercial Auto/20.0000 Commercial Auto CombinationsProduct Name:Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

#### Related Objection 8

Comments: The category of "Unknown" for Prior Carrier Length is viewed as potentially unfairly discriminatory since this should be a known quantity and "0" and "11+" are already available options.

Explain how a policyholder could be in the "Unknown" category or remove this as an option.

#### Changed Items:

No Form Schedule items changed.

Rate Schedule Item Changes						
Item				Previous State Filing		
No.	Exhibit Name	Rule # or Page #	Rate Action	Number	Date Submitted	
1	Underwriting Tiering Guidelines	Underwriting Tiering Guidelines	Replacement	BNIC-133371521	07/24/2024 By: Paula Rossman	
Previous Version						
1	Underwriting Tiering Guidelines	Underwriting Tiering Guidelines	Replacement	BNIC-133371521	06/13/2024 By: Ashley Allen	

No Supporting Documents changed.

## Response 9

#### Comments:

Average Number of Relevant Claims is based on the claim history of a policyholder prior to the policy effective date, which is unavailable for a newly established business entity. The category of Unknown is for this type of policyholders and 0 is inappropriate in this situation since it should be essentially different from policyholder with insurance history and 0 claims.

## Related Objection 9

Comments: The category of "Unknown" for Average Number of Relevant Claims is viewed as potentially unfairly discriminatory since this should be a known quantity and "0" is already an option.

Explain how a policyholder could be in the "Unknown" category or remove this as an option.

## Changed Items:

No Form Schedule items changed.

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI:20.0 Commercial Auto/20.0000 Commercial Auto CombinationsProduct Name:Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

#### Response 10

#### Comments:

We have removed the Missing category for Driver Experience from the rule.

### Related Objection 10

Comments: The category of "Missing" for Driver Experience is viewed as potentially unfairly discriminatory since this should be a known quantity.

Explain how a policyholder could be in the "Unknown" category or remove this as an option.

#### Changed Items:

No Form Schedule items changed.

Rate Schedule Item Changes						
Item				Previous State Filing		
No.	Exhibit Name	Rule # or Page #	Rate Action	Number	Date Submitted	
1	Driver Quality Factor	Driver Quality Factor - 1	Replacement	BNIC-133371521	07/24/2024 By: Paula Rossman	
Previous Version						
1	Driver Quality Factor	Driver Quality Factor - 1	Replacement	BNIC-133371521	06/13/2024 By: Ashley Allen	

No Supporting Documents changed.

#### Conclusion:

Sincerely,

Paula Rossman

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI:20.0 Commercial Auto/20.0000 Commercial Auto CombinationsProduct Name:Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

## **Note To Reviewer**

Created By:

Paula Rossman on 08/23/2024 03:27 PM

Last Edited By:

Filing Rules Migration

**Submitted On:** 

12/15/2024 02:01 AM

Subject:

Effective date - Change Requested

**Comments:** 

The Company would like to change the approved effective date from 11/01/2024 to 12/15/2024 for new and renewal dates.

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Reviewer Note**

Created By:

Brad Wolfenbarger on 08/08/2024 09:14 AM

Last Edited By:

Filing Rules Migration

**Submitted On:** 

12/15/2024 02:01 AM

Subject:

AA Reviewed

**Comments:** 

Χ

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Reviewer Note**

Created By:

Brad Wolfenbarger on 07/31/2024 10:53 AM

Last Edited By:

Filing Rules Migration

**Submitted On:** 

12/15/2024 02:01 AM

Subject:

AA Sent Second Letter

**Comments:** 

Χ

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Reviewer Note**

Created By:

Brad Wolfenbarger on 07/12/2024 05:39 AM

Last Edited By:

Filing Rules Migration

**Submitted On:** 

12/15/2024 02:01 AM

Subject:

AA Sent Letter

**Comments:** 

Χ

SERFF Tracking #: BNIC-134120828 State Tracking #: BNIC-134120828

Company Tracking #: OH-CA-RARUFM-BSB

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# Post Submission Update Request Processed On 07/24/2024

Status: Allowed

Created By: Paula Rossman
Processed By: Stewart Trego

Comments:

#### **Rate Information:**

Field Name Requested Change Prior Value

Rate Data Applies Yes No

Filing Method File and Use
Rate Change Type Increase
Overall Pct. of Last Revision 0.000%
Effective Date of Last revision 11/01/2022
Filing Method of Last Filing File and Use
SERFF Tracking Number of Last Filing BNIC-133371521

## **Company Rate Information:**

Company Name: Berkley Casualty Company

Field Name Requested Change Prior Value

Overall % Indicated Change 0.100%

Overall % Rate Impact 0.100%

Written Premium Change for this Program \$1345

Number of Policy Holders Affected for this 23

Program

Written Premium for this Program \$921052

Maximum %Change (where required) 3.600%

Minimum %Change (where required) -3.500%

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# Post Submission Update Request Processed On 08/26/2024

Status: Allowed

Created By: Paula Rossman
Processed By: Brad Wolfenbarger

Comments:

**General Information:** 

Field NameRequested ChangePrior ValueEffective Date Requested (New)12/15/202411/01/2024Effective Date Requested (Renew)12/15/202411/01/2024

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **Rate Information**

Rate data applies to filing.

Filing Method: File and Use

Rate Change Type: Increase

Overall Percentage of Last Rate Revision: 0.000%

Effective Date of Last Rate Revision: 11/01/2022
Filing Method of Last Filing: File and Use

SERFF Tracking Number of Last Filing: BNIC-133371521

**Company Rate Information** 

			oompany mar	o iiiioiiiiatioii			
	Overall %	Overall %	Written Premium	Number of Policy	Written	Maximum %	Minimum %
Company	Indicated	Rate	Change for	<b>Holders Affected</b>	Premium for	Change	Change
Name:	Change:	Impact:	this Program:	for this Program:	this Program:	(where req'd):	(where req'd):
Berkley Casualty Company	0.100%	0.100%	\$1,345	23	\$921,052	3.600%	-3.500%

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# Rate/Rule Schedule

Item	Schedule Item				Previous State	
No.	Status	Exhibit Name	Rule # or Page #	Rate Action	Filing Number	Attachments
1	Filed 08/08/2024	Driver Quality Factor	Driver Quality Factor - 1	Replacement	BNIC-133371521	TM 2.0 DQF Rule 08 24_OH.pdf
2	Filed 08/08/2024	Rule 24. Truckers / Motor Carriers	Rule 24. Truckers / Motor Carriers	Replacement	BNIC-133371521	TM 2.0 Rule 24.pdf
3	Filed 08/08/2024	Rule 25. Premium Development - Zone Rated Autos	Rule 25. Premium Development - Zone Rated Autos	Replacement	BNIC-133371521	TM 2.0 Rule 25 10 24.pdf
4	Filed 08/08/2024	Weighted Average Radius / Zone Rule	Weighted Average Radius / Zone Rule	Replacement	BNIC-133371521	TM 2.0 WA Rule 10 24.pdf
5	Filed 08/08/2024	Violation Category Mapping Table	Violation Category Mapping Table	Replacement	BNIC-133371521	SmallTrucking - DQF Violation Mapping_CW_06 24.pdf
6	Filed 08/08/2024	Company Loss Cost Multipliers	LCM – 1	Replacement	BNIC-133371521	Auto LCM Rule - OH 03 24.pdf
7	Filed 08/08/2024	Rule 298. Deductible Insurance	Rule 298. Deductible Insurance	Replacement	BNIC-133371521	Auto Rule 298 - OH 03 24.pdf
8	Filed 08/08/2024	Rule 23. Trucks, Tractors and Trailer Classifications	Rule 23. Trucks, Tractors and Trailer Classifications	Replacement	BNIC-133371521	Revised CA Rule 23 09- 2023.pdf
9	Filed 08/08/2024	State Zone Loss Cost	State Zone Loss Cost	New		BSB_State Zone Loss Cost 03 24_2 OH.pdf
10	Filed 08/08/2024	Zip Code Zone Loss Cost	Zip Code Zone Loss Cost	New		BSB_Zip Code Zone Loss Cost 03 24_2 OH.pdf
11	Filed 08/08/2024	Rule 1. Application of this Division	Rule 1. Application of this Division	Replacement	BNIC-133371521	Auto Rule 1 - OH Default with table.pdf
12	Filed 08/08/2024	Underwriting Tiering Guidelines	Underwriting Tiering Guidelines	Replacement	BNIC-133371521	BSB_Underwriting Tiering Guidelines 2.0_OH_updated.pdf

#### **Company Rules**

#### **MULTISTATE**

#### **DRIVER QUALITY FACTOR**

A Driver Quality Factor will be applied multiplicatively to Liability, No Fault, Medical Payments, Comprehensive, Specified Causes of Loss, and Collision coverages. This is applicable only to Trucks Tractors and Trailers, and will not be modified because of midterm changes.

The following variables are used in determining the Driver Quality Factor:

- Driver Experience: Years of driving experience for each driver
- Motor Vehicle Record (MVR): Considers driver violations and incidents related to each driver

The Driver Quality Factor is calculated as:

Driver Quality Factor =

(Average Driver Quality Score x Number of Listed Drivers + 1.15 x Number of Undisclosed Drivers) / (Number of Listed Drivers + Number of Undisclosed Drivers)

Where,

Average Driver Quality Score = Average Driver Experience Score Factor x Average MVR Score Factor

Average Driver Experience Score = Average (Driver Experience Score for each driver)

Average MVR Score = Average (Number of Super & Major Violations Factor

- x Number of Minor Violations Factor
- x Number of Other Administrative Violations Factor
- x Number of Findings of Defective Equipment Factor
- x Number of Incidents Factor
- x Number of Months Since Last Incident Factor)

The Driver Quality Factor calculated above will be applied to Liability, No Fault, Medical Payments, and Collision coverages. For Comprehensive and Specified Causes of Loss coverages, apply the following factor:

Driver Quality Factor – Comprehensive = 0.25 x Driver Quality Factor + 0.75 x 1.000

## **Company Rules**

#### **MULTISTATE**

### **Lookup Tables**

Table 1-1. Driver Experience

Driver		Driver		Driver		Driver	
Experience	Score	Experience	Score	Experience	Score	Experience	Score
0	1.57	20	1.026	40	0.962	60	1.063
1	1.516	21	1.019	41	0.963	61	1.073
2	1.465	22	1.012	42	0.965	62	1.084
3	1.415	23	1.006	43	0.967	63	1.095
4	1.369	24	1	44	0.969	64	1.106
5	1.324	25	0.995	45	0.971	65	1.118
6	1.281	26	0.99	46	0.975	66	1.131
7	1.24	27	0.985	47	0.978	67	1.145
8	1.201	28	0.981	48	0.982	68	1.159
9	1.163	29	0.977	49	0.986	69	1.173
10	1.128	30	0.974	50	0.991	70 or more	1.189
11	1.115	31	0.971	51	0.996		
12	1.103	32	0.968	52	1.002		
13	1.092	33	0.966	53	1.008		
14	1.081	34	0.964	54	1.014		
15	1.07	35	0.963	55	1.021		
16	1.061	36	0.962	56	1.029		
17	1.051	37	0.961	57	1.036		
18	1.043	38	0.961	58	1.045		
19	1.034	39	0.962	59	1.054		

Table 1-2. Average Driver Experience Score

Average Driver Experience Score						
Greater	And less than or					
than	equal to	Factor				
0	0.986	0.989				
0.986	0.998	1.000				
0.998	1.01	1.020				
1.01	1.022	1.048				
1.022	1.034	1.087				
1.034	1.046	1.135				
1.046	1.058	1.196				
1.058	1.07	1.270				
1.07	1.082	1.344				
1.082	1.094	1.418				

## **Company Rules**

### **MULTISTATE**

1.094	1.106	1.492
1.106	1.3	1.566
1.3		1.750

Table 2-1. Number of Super & Major Violations

Number of Super &	
<b>Major Violations</b>	Factor
0	1.000
1	1.354
2	1.716
3	2.117
4	2.573
5	3.098
6	3.707
7	4.414
8	5.238
9	6.197
10 or more	7.315

Table 2-2. Number of Minor Violations

Number of Minor		
Violations	Factor	
0	1.000	
1	1.152	
2	1.252	
3	1.328	
4	1.390	
5	1.443	
6	1.489	
7	1.530	
8	1.567	
9	1.602	
10 ore more	1.633	

Table 2-3. Number of Other Administrative Violations

Number of Other Administrative	
Violations	Factor
0	1.000

## **Company Rules**

#### **MULTISTATE**

1	1.151
2	1.250
3	1.325
4	1.386
5	1.438
6	1.484
7	1.525
8	1.561
9	1.595
10 or more	1.626

Table 2-4. Number of Findings of Defective Equipment

Number of Findings of Defective Equipment	Factor
0	1.000
1 or more	1.367

Table 2-5. Number of Incidents

Number of Incidents	Factor
0	1.000
1	1.050
2	1.081
3	1.103
4	1.121
5	1.135
6 or more	1.148

Table 2-6. Number of Months Since Last Chargeable Event

Number of Months Since Last Incident				
	And less than			
<b>Greater Than</b>	or equal to	Factor		
0	5	1.081		
5	11	1.067		
11	17	1.054		
17	23	1.040		
23	29	1.026		
29	36	1.013		

## **Company Rules**

### **MULTISTATE**

36 1.000

Table 2-7. Average MVR Score

	Average MVR Score				
Greater	And less than or	Selected	Greater	And less than or	Selected
than	equal to	Factor	than	equal to	Factor
0	1	1.000	1.628	1.644	1.727
1	1.02	1.014	1.644	1.66	1.750
1.02	1.036	1.028	1.66	1.676	1.773
1.036	1.052	1.042	1.676	1.692	1.797
1.052	1.068	1.056	1.692	1.708	1.821
1.068	1.084	1.071	1.708	1.724	1.845
1.084	1.1	1.086	1.724	1.74	1.869
1.1	1.116	1.101	1.74	1.756	1.894
1.116	1.132	1.116	1.756	1.788	1.919
1.132	1.148	1.131	1.788	1.82	1.944
1.148	1.164	1.147	1.82	1.852	1.969
1.164	1.18	1.163	1.852	1.884	1.997
1.18	1.196	1.179	1.884	1.916	2.025
1.196	1.212	1.195	1.916	1.948	2.053
1.212	1.228	1.212	1.948	1.98	2.081
1.228	1.244	1.228	1.98	2.012	2.113
1.244	1.26	1.245	2.012	2.044	2.145
1.26	1.276	1.263	2.044	2.076	2.177
1.276	1.292	1.280	2.076	2.108	2.209
1.292	1.308	1.298	2.108	2.14	2.244
1.308	1.324	1.316	2.14	2.172	2.279
1.324	1.34	1.334	2.172	2.204	2.314
1.34	1.356	1.352	2.204	2.252	2.349
1.356	1.372	1.371	2.252	2.3	2.389
1.372	1.388	1.390	2.3	2.348	2.429
1.388	1.404	1.409	2.348	2.396	2.469
1.404	1.42	1.429	2.396	2.444	2.509
1.42	1.436	1.449	2.444	2.492	2.551
1.436	1.452	1.469	2.492	2.54	2.593
1.452	1.468	1.489	2.54	2.588	2.635
1.468	1.484	1.509	2.588	2.636	2.677
1.484	1.5	1.530	2.636	2.684	2.722

## **Company Rules**

### **MULTISTATE**

1.5	1.516	1.551	2.684	2.732	2.767
1.516	1.532	1.572	2.732	2.78	2.812
1.532	1.548	1.593	2.78	2.828	2.857
1.548	1.564	1.615	2.828	2.876	2.905
1.564	1.58	1.637	2.876	2.924	2.953
1.58	1.596	1.659	2.924	2.972	3.001
1.596	1.612	1.681	2.972	3.02	3.049
1.612	1.628	1.704	3.02		3.099

#### **Company Rules**

#### **MULTISTATE**

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- x Number of Incidents Factor
- x Number of Months Since Last Incident Factor)

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# **Company Rules**

#### **MULTISTATE**

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11	1.115	31	0.971	51	0.996	Missing	1
12	1.103	32	0.968	52	1.002		
13	1.092	33	0.966	53	1.008		
14	1.081	34	0.964	54	1.014		
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1.022	1.034	1.087			
1.034	1.046	1.135			
1.046	1.058	1.196			
1.058	1.07	1.270			
1.07	1.082	1.344			
1.082	1.094	1.418			

# **Company Rules**

#### **MULTISTATE**

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1.106	1.3	1.566
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# **Company Rules**

### **MULTISTATE**

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Table 2-4. Number of Findings of Defective Equipment

Number of Findings of Defective Equipment	Factor
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Number of Incidents	Factor
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Number of Months Since Last Incident					
And less than					
Greater Than or equal to Facto					
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5	11	1.067			
11	17	1.054			
17	23	1.040			
23	29	1.026			
29	36	1.013			

# **Company Rules**

### **MULTISTATE**

36 1.000

Table 2-7. Average MVR Score

Average MVR Score						
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1.068	1.084	1.071	1.708	1.724	1.845	
1.084	1.1	1.086	1.724	1.74	1.869	
1.1	1.116	1.101	1.74	1.756	1.894	
1.116	1.132	1.116	1.756	1.788	1.919	
1.132	1.148	1.131	1.788	1.82	1.944	
1.148	1.164	1.147	1.82	1.852	1.969	
1.164	1.18	1.163	1.852	1.884	1.997	
1.18	1.196	1.179	1.884	1.916	2.025	
1.196	1.212	1.195	1.916	1.948	2.053	
1.212	1.228	1.212	1.948	1.98	2.081	
1.228	1.244	1.228	1.98	2.012	2.113	
1.244	1.26	1.245	2.012	2.044	2.145	
1.26	1.276	1.263	2.044	2.076	2.177	
1.276	1.292	1.280	2.076	2.108	2.209	
1.292	1.308	1.298	2.108	2.14	2.244	
1.308	1.324	1.316	2.14	2.172	2.279	
1.324	1.34	1.334	2.172	2.204	2.314	
1.34	1.356	1.352	2.204	2.252	2.349	
1.356	1.372	1.371	2.252	2.3	2.389	
1.372	1.388	1.390	2.3	2.348	2.429	
1.388	1.404	1.409	2.348	2.396	2.469	
1.404	1.42	1.429	2.396	2.444	2.509	
1.42	1.436	1.449	2.444	2.492	2.551	
1.436	1.452	1.469	2.492	2.54	2.593	
1.452	1.468	1.489	2.54	2.588	2.635	
1.468	1.484	1.509	2.588	2.636	2.677	
1.484	1.5	1.530	2.636	2.684	2.722	

# **Company Rules**

### **MULTISTATE**

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1.532	1.548	1.593	2.78	2.828	2.857
1.548	1.564	1.615	2.828	2.876	2.905
1.564	1.58	1.637	2.876	2.924	2.953
1.58	1.596	1.659	2.924	2.972	3.001
1.596	1.612	1.681	2.972	3.02	3.049
1.612	1.628	1.704	3.02		3.099

# SMALL BUSINESS TRANSPORTATION PROGRAM DIVISION ONE – AUTOMOBILE COMMERCIAL LINES MANUAL

**ISO State Insurance Manual Exceptions** 

#### **MULTISTATE**

# **RULE 24. TRUCKERS / MOTOR CARRIERS**

The proprietary changes in BSB edition 08 19 are withdrawn.

# SMALL BUSINESS TRANSPORTATION PROGRAM DIVISION ONE – AUTOMOBILE COMMERCIAL LINES MANUAL

### **ISO State Insurance Manual Exceptions**

### **Company Rules**

#### **MULTISTATE**

#### **RULE 25. PREMIUM DEVELOPMENT – ZONE RATED AUTOS**

- 1. Except with respect to Trailer Interchange, Section 25.B Development of Zone Combination is withdrawn in its entirety
- 2. Section 25.C.1.d is replaced by the following:

Determine the base loss cost for the desired coverage from the **Zip Code Zone Loss Cost** table utilizing vehicle's garaging zip code as look- up. If zip code is not found, utilize the **State Zone Loss Cost** table utilizing vehicle's garaging state as look-up.

3. Section 25.E. Zone-rating Tables is withdrawn in its entirety

# SMALL BUSINESS TRANSPORTATION PROGRAM DIVISION ONE – AUTOMOBILE COMMERCIAL LINES MANUAL

#### **Company Rules**

#### **MULTISTATE**

## WEIGHTED AVERAGE RADIUS / ZONE RULE

- A. For each Truck, Tractor or Trailer, the premium will be the average of the local, intermediate and long distance premiums for that vehicle weighted by the expected distribution of mileage by radius for the upcoming policy term.
- B. Local and intermediate radii will be determined as set forth in Rules 22 and 23.
- C. For long distance radius will be determined as set forth in Rule 25.
- D. This rule will be applicable to Liability, Pollution Liability, Comprehensive, Specified Causes of Loss, and Collision coverages.
- E. Example:
  - 1. Vehicle A is garaged in zip 12345 Terr 123 in XX state. The annual mileage for Vehicle A is 100,000. Vehicle A is expected to have 25,000 miles within the local radius, 25,000 miles within the intermediate radius, and 50,000 miles long distance.
  - 2. The premium would be calculated as follows:

(Final liability premium for Vehicle A rated as local)\*25,000/100,000

- + (Final liability premium for Vehicle A rated as intermediate)\*25,000/100,000
- + (Final liability premium for Vehicle A rated as long-distance)\*50,000/100,000
- = Final liability premium for Vehicle A.

Violation Category Mapping Table			Edition 06 24
State	Code	Description	<b>Driver Quality Factor Category</b>
ALL	1110	NO SVC DESCRIPTION AVAILABLE	Not Applicable
ALL	1120	UNCLASSIFIED (UNCL) STATE CODE	Not Applicable
ALL	1130	STATE CODE/DESCRIPTION NOT VALID	Not Applicable
ALL	11010	SALES VIOLATION BY MFR OR DLR	Not Applicable
ALL	11020	VIOLATION BY BUSINESS OTHER THAN MFR OR DLR	Not Applicable
ALL	11100	REG VIOL, GENERALLY	Minor Violation
ALL	11110	DRIV OR PERM OPER OF VEH NOT REG	Not Applicable
ALL	11210	REG TO BE CARRIED IN VEH AND DISPL	Not Applicable
ALL	11220	VEH SHALL DISPL REG PLATES	Not Applicable
ALL	11230	REG PLATES TO BE CLEARLY VISIBLE	Not Applicable
ALL	11310	VEH NOT TO BE OPER W/O REG/PLATES	Not Applicable
ALL	11320	VEH NOT TO BE OPER WHILE REG IS SUSP/REV	Not Applicable
ALL	11410	LEND/BORROW OR PERM USE REG CARD, PLATE, TITLE	Not Applicable
ALL	11510	ALL VEH TO SUBMIT TO VEH INSP	Not Applicable
ALL	11520	CERTIF OF INSP TO BE DISPL AT ALL TIMES	Not Applicable
ALL	11530	UNLAWFUL TO DISPL FALSE CERTIF OF INSP	Not Applicable
ALL	11610	OWNER TO RET REG MATERIAL UPON SUSP/REV/CANC	Not Applicable
ALL	11710	ALTER, FORGE, COUNTERFEIT TITLE, REG, PLATES	Minor Violation
ALL	11720	POSSESSION/USE OF ALTERED TITLE, REG, PLATES	Minor Violation
ALL	11730	USE OF FALSE NAME/STATMT TO OBTAIN TITLE, REG	Minor Violation
ALL	11800	OWNER TO NOTIFY DEPT OF CHNG OF NAME/ADDRESS	Not Applicable
ALL	11810	OWNER TO NOTIFY DEPT OF CHNG OF ADDRESS	Not Applicable
ALL	11820	OWNER TO NOTIFY DEPT OF CHNG OF NAME	Not Applicable
ALL	12010	LICENSING ACTION	Not Applicable
ALL	12011	SUSPENSION	Not Applicable
ALL	12012	REVOCATION	Not Applicable
ALL	12013	REINSTATEMENT	Not Applicable
ALL	12020	ADMINISTRATIVE MESSAGE	Not Applicable
ALL	12030	HABITUAL OFFENDER	Not Applicable
ALL	12100	NO DRIV LIC, GENERALLY	Not Applicable
ALL	12110	DRIVE WITHOUT CORRECT LICENSE CLASS	Not Applicable

ALL	12120	EXPIRED LICENSE	Not Applicable
ALL	12130	PERSON UND 18/21 NOT TO OPER SCHOOL BUS	Major Violation
ALL	12150	PERSONS UND 18 NOT DRIV FOR HIRE	Major Violation
ALL	12210	FAIL TO SURR OUT-OF-ST PERM; MORE THAN 1 LIC	Not Applicable
ALL	12300	UNSPECIFIED LIC MISREP, UNLAWFUL USE OF LIC	Not Applicable
ALL	12310	UNLAWFUL TO LEND LIC	Not Applicable
ALL	12320	UNLAWFUL TO DISPL ANOTHER PERSONS LIC	Not Applicable
ALL	12330	USE OF FALSE NAME/OTHR STATMT TO OBTAIN LIC	Not Applicable
ALL	12340	LICENSEE SHALL NOT PERM UNLAWFUL USE OF LIC	Not Applicable
ALL	12350	FAIL TO COMPLY W/LIC PROVISIONS	Not Applicable
ALL	12360	FAIL TO SURR SUSP/REV LIC	Not Applicable
ALL	12370	UNLAWFUL TO DISPL ALTERED, CANC/SUSP/REV LIC	Not Applicable
ALL	12380	MUTILATED LIC	Not Applicable
ALL	12410	DRIV WHILE LIC SUSP/REV	Major Violation
ALL	12420	VIOLATION OF OUT-OF-SERVICE ORDER	Major Violation
ALL	12430	DEPT MAY EXTEND SUSP/REV FOR DWS/DWR	Not Applicable
ALL	12440	NO OPER ON FOREIGN LIC DURING SUSP/REV	Major Violation
ALL	12450	DRIV WHILE WITHDRAWN FOR HAB OFFENDER-MISDEM	Major Violation
ALL	12460	DRIV WHILE WITHDRAWN FOR HAB OFFENDER-FELONY	Major Violation
ALL	12500	PERM UNAUTH PERSON TO DRIV, GENERALLY	Not Applicable
ALL	12510	PERM UNLICENSED DRIVER TO DRIVE	Not Applicable
ALL	12520	PERM UNAUTH MINOR TO DRIV	Not Applicable
ALL	12610	FREQ VIOLATOR AS DETERMINED BY PT SYSTEM	Not Applicable
ALL	12620	HABITUALLY RECKLESS OR NEGLIGENT	Not Applicable
ALL	12630	FREQ OF SERIOUS VIOL TO INDICATE DISREGARD	Not Applicable
ALL	12710	LICENSEE TO NOTIFY DEPT OF NAME/ADDRESS CHNG	Not Applicable
ALL	12720	FALSE AFFIDAVIT OF DRIVERS LICENSE APPLICATION	Not Applicable
ALL	12730	FRAUDULENT LIC EXAM	Not Applicable
ALL	13010	ID CARD VIOL	Not Applicable
ALL	13110	DRIV TO CARRY LIC AND DISPL ON DEMAND	Not Applicable
ALL	13200	VIOLATING CONDITIONS OF LIC, GENERALLY	Not Applicable
ALL	13210	DRIV IN VIOL OF RESTR OF LIC	Minor Violation
ALL	13220	VIOL OF INSTRUCTION PERM	Not Applicable

ALL	13230	VIOL OF PROVISIONAL, PROBATIONAL, JUVENILE LIC	Not Applicable
ALL	13310	VIOL OF CONDITIONS OF EMPL-RELATED RESTR LIC	Not Applicable
ALL	13320	VIOL OF OTHER OPERATIONALLY RESTR LIC	Not Applicable
ALL	13410	REFUSAL TO SUBMIT TO CHEMICAL TEST	Major Violation
MD	13410	REFUSAL TO SUBMIT TO CHEMICAL TEST	Not Applicable
ALL	13420	NOTICE OF CHEMICAL TEST ABOVE LEGAL LIMIT	Major Violation
MD	13420	NOTICE OF CHEMICAL TEST ABOVE LEGAL LIMIT	Not Applicable
ALL	13510	LICENSEE NOT ENTITLED/GAVE WRNG INFO, LIC CANC	Minor Violation
ALL	14110	LOSS OF CONSENT FOR MINOR'S LICENSE	Minor Violation
ALL	15100	LICENSE OR REGISTRATION VIOL-NO DISTINCTION	Minor Violation
ALL	15210	REGISTRATION/TITLE WITHDRAWN	Not Applicable
ALL	15310	REGISTRATION RESTORED	Not Applicable
ALL	16100	WITHDRAWAL RECREATIONAL VEHICLE	Not Applicable
ALL	16110	SUSP OR WITHDRWAL, UNSPECIFIED, OTHER	Not Applicable
ALL	16120	ADMIN WITHDRWAL, (FTA, TAX PAYMNT, ETC.)	Not Applicable
ALL	16130	SR-22/FIN/JUDG/INS WITHDRWAL	Not Applicable
ALL	16140	WITHDRWAL-FAIL TO COMPLY PROG/PROBATION	Not Applicable
ALL	16150	OUT OF STATE WITHDRWAL	Not Applicable
ALL	16160	ACCIDENT INVOLVEMENT WITHDRWAL	Not Applicable
ALL	16170	ACCUMULATED OFFENSE WITHDRWAL	Not Applicable
ALL	16180	POINT SYSTEM SUSP	Not Applicable
ALL	16210	SERIOUS OFFENSE (NON-ALCOHOL) WITHDRWAL	Not Applicable
ALL	16220	ALCOHOL/DRUG WITHDRAWAL	Not Applicable
MD	16220	ALCOHOL/DRUG WITHDRAWAL	Not Applicable
ALL	16230	HABITUAL OFFENDER WITHDRWAL	Not Applicable
ALL	16240	COURT ORDERED WITHDRWAL	Not Applicable
ALL	16250	WITHDRWAL REINSTATEMENT/APPEAL DENIED	Not Applicable
ALL	16260	ALCOHOL (BAC ABOVE LEGAL LIMIT) WITHDRAWAL	Not Applicable
MD	16260	ALCOHOL (BAC ABOVE LEGAL LIMIT) WITHDRAWAL	Not Applicable
ALL	16290	REVOCATION, UNSPECIFIED, OTHER	Not Applicable
ALL	16310	LIC RESTRICTION, PROB	Not Applicable
ALL	16320	LICENSE RESTR/OCCUP LIC ISSUED	Not Applicable
ALL	16330	SUSP OF ENDORSEMENT	Not Applicable
	•		

ALL	16340	PROBATION	Not Applicable
ALL	16350	MODIFICATION OF COND/RESTRICTIONS	Not Applicable
ALL	16360	APPEAL OF RESTRIC/PROB, ETC DENIED OR DROPPED	Not Applicable
ALL	16410	CANCELLATION	Not Applicable
ALL	16420	WITHDRWAL, LOSS OF CONSENT FOR MINOR	Not Applicable
ALL	16430	WITHDRWAL, MEDICAL REASONS/INCOMPETENCY	Not Applicable
ALL	16440	DECEASED	Not Applicable
ALL	16450	WITHDRWL, INCORRECT INFO	Not Applicable
ALL	16460	WITHDRWAL, FALSE INFO	Not Applicable
ALL	16510	DENIAL, GENERAL	Not Applicable
ALL	16520	FAILED EXAM	Not Applicable
ALL	16530	FAILED WRITTEN EXAMINATION	Not Applicable
ALL	16540	FAILED FIELD EXAMINATION	Not Applicable
ALL	16550	FAILED VISION EXAMINATION	Not Applicable
ALL	16560	FAILED SPECIAL EXAM/REVIEW	Not Applicable
ALL	16610	VOL SURRENDER OF LICENSE	Not Applicable
ALL	16690	DISQUALIFICATION, GENERALLY	Not Applicable
ALL	16700	CDL DISQUALIFICATION, GENERALLY	Not Applicable
ALL	16710	CDL DISQUALIFICATION: BAC .04+	Not Applicable
MD	16710	CDL DISQUALIFICATION: BAC .04+	Not Applicable
ALL	16720	CDL DISQUALIFICATION: BAC .10+	Not Applicable
MD	16720	CDL DISQUALIFICATION: BAC .10+	Not Applicable
ALL	16730	CDL DISQUALIFICATION: CHEMICAL TEST REFUSAL	Not Applicable
MD	16730	CDL DISQUALIFICATION: CHEMICAL TEST REFUSAL	Not Applicable
ALL	16740	CDL DISQUALIFICATION: DUI CONTROLLED SUBSTANC	Not Applicable
MD	16740	CDL DISQUALIFICATION: DUI CONTROLLED SUBSTANC	Not Applicable
ALL	16750	CDL DISQUALIFICATION: LEAVING SCENE OF ACCID	Not Applicable
ALL	16760	CDL DISQUALIFICATION: INVOLVED IN FELONY	Not Applicable
ALL	16810	CDL 3 YR DISQUAL: BAC .04+, HAZ MAT	Not Applicable
MD	16810	CDL 3 YR DISQUAL: BAC .04+, HAZ MAT	Not Applicable
ALL	16820	CDL 3 YR DISQUAL: BAC .10+, HAZ MAT	Not Applicable
MD	16820	CDL 3 YR DISQUAL: BAC .10+, HAZ MAT	Not Applicable
ALL	16830	CDL 3 YR DISQUAL: TEST REFUSAL, HAZ MAT	Not Applicable

MD	16830	CDL 3 YR DISQUAL: TEST REFUSAL, HAZ MAT	Not Applicable
ALL	16840	CDL 3 YR DISQUAL: DUI CONTROL SUBST, HAZ MAT	Not Applicable
MD	16840	CDL 3 YR DISQUAL: DUI CONTROL SUBST, HAZ MAT	Not Applicable
ALL	16850	CDL 3 YR DISQUAL: LEAVING SCENE, HAZ MAT	Not Applicable
ALL	16860	CDL 3 YR DISQUAL: INVOLVED IN FELONY, HAZ MAT	Not Applicable
ALL	16890	CDL DISQUALIFICATION: MANSLAUGHTER, HAZ MAT	Not Applicable
ALL	16910	CDL LIFE DISQUAL: MANUF, DISTR, DISP CONT SUB	Not Applicable
MD	16910	CDL LIFE DISQUAL: MANUF, DISTR, DISP CONT SUB	Not Applicable
ALL	16920	CDL LIFE DISQUAL: COMBINATION OF C11-C16	Not Applicable
ALL	16930	CDL DISQUAL: 2 SERIOUS CONVICTIONS IN 3 YRS	Not Applicable
ALL	16940	CDL 120 DAY DISQUAL: 3 SERIOUS CONV IN 3 YRS	Not Applicable
ALL	16990	CDL 24 HR OUT-OF-SERVICE: DETECTABLE ALCOHOL	Not Applicable
MD	16990	CDL 24 HR OUT-OF-SERVICE: DETECTABLE ALCOHOL	Not Applicable
ALL	17110	REIN, LIC RESTORED OR REISSUED	Not Applicable
ALL	17120	WITHDRWAL, LIFTED/STAYED/APPEALED	Not Applicable
ALL	17130	ELIGIBLE FOR LIC	Not Applicable
ALL	17140	WITHDRAWN IN ERROR, EXPUNGED	Not Applicable
ALL	17150	RESTORATION OF PRIV AFTER LIMIT OR RESTR	Not Applicable
ALL	17160	RELEASE FROM PROBATION	Not Applicable
ALL	17170	PARTIAL RESTORATION	Not Applicable
ALL	17180	RESTRICTION/OTHER ACTION APPEALED (STAYED)	Not Applicable
ALL	17210	REPEALED LAW	Not Applicable
ALL	17220	NOT GUILTY,CHARGE VACATED,EXPUNGED,OVERTURNED	Not Applicable
ALL	18110	IMPROVEMENT ACTION UNSPECIFIED, OTHER	Not Applicable
MD	18120	ALCOHOL CLINIC, COURSE, PROGRAM	Not Applicable
ALL	18120	ALCOHOL CLINIC, COURSE, PROGRAM	Not Applicable
ALL	18130	CLASS, COURSE, SCHOOL	Not Applicable
ALL	18140	EDUCATIONAL PROGRAM	Not Applicable
ALL	18150	HEARING	Not Applicable
ALL	18160	INTERVIEW	Not Applicable
ALL	18170	WARNING LETTER	Not Applicable
ALL	18210	SPECIAL EXAM REQUIRED	Not Applicable
ALL	18220	SPECIAL REVIEW/MEDICAL/REQUIRED	Not Applicable

ALL	18310	RESCHEDULE/POSTPONED CLASS, HEARING ETC.	Not Applicable
ALL	18320	FAILURE TO APPEAR INTERVIEW/HEAR/EXAM	Not Applicable
ALL	18330	FAILURE TO ATTEND/COMPLETE COURSE, PROG	Not Applicable
ALL	18340	NO ACTION	Not Applicable
ALL	18410	RECORD FLAG	Not Applicable
ALL	18420	FREQUENT VIOLATOR	Not Applicable
ALL	18430	3 CONV IN ONE YEAR FLAG	Not Applicable
ALL	18440	HABITUAL VIOLATOR FLAG	Not Applicable
ALL	18450	FREQUENT ACCIDENTS FLAG	Not Applicable
ALL	18460	ACTION PENDING	Not Applicable
ALL	18470	UNDER INVESTIGATION REVIEW	Not Applicable
ALL	18510	PUNISHMENT TERMS - FINE, JAIL, SERVICE, ETC	Not Applicable
ALL	18520	FINANCIAL RESPONSIBILITY NOTICE REQUIREMENTS	Not Applicable
ALL	19110	LICENSE ISSUED OR REISSUED	Not Applicable
ALL	19120	CLASS OR ENDORSEMENT CHANGE	Not Applicable
ALL	19130	ID CARD ISSUED, WITHDRAWN, ETC.	Not Applicable
ALL	19140	CHANGE OF NAME; ADDRESS, DOB ETC.	Not Applicable
ALL	19150	MOVED OUT OF STATE	Not Applicable
ALL	19160	MOVING IN FROM ANOTHER STATE	Not Applicable
ALL	19170	ORGAN DONOR	Not Applicable
ALL	19210	POINT CREDIT	Not Applicable
ALL	19220	DRIVER ED (HIGH SCHOOL ETC.)	Not Applicable
ALL	19230	EXAM PASSED	Not Applicable
ALL	19310	FINANCIAL TRANSACTION	Not Applicable
ALL	19320	REQUIREMENTS SATISFIED	Not Applicable
ALL	19330	BAD/PROTESTED CHECK	Not Applicable
ALL	19340	FAILURE TO DEPOSIT SECURITY	Not Applicable
ALL	19350	FEE DUE	Not Applicable
ALL	19410	CORRESPONDENCE SENT	Not Applicable
ALL	19420	LETTER NOT DELIVERED	Not Applicable
ALL	19430	CORRESPONDENCE RECEIVED	Not Applicable
ALL	21110	OWNER NOT TO PERM OPER OF UNINSURED VEH	Minor Violation
ALL	21120	PERSON SHALL NOT DRIV UNINSURED VEH	Minor Violation

ALL	21130	OWNER SHALL RET REG IF INS CANC	Minor Violation
ALL	21140	CANC OF INS IN MANDATORY INS STATE	Not Applicable
ALL	21210	NON-PAYMENT OF JUDGMENT	Not Applicable
ALL	21220	DEFAULT ON INSTALLMENT PAYMENT	Not Applicable
ALL	21310	FAIL TO MEET SECURITY FOLLOW ACC	Not Applicable
ALL	21320	FAIL TO FILE FUTURE PROOF FOLLOW CONVICTION	Not Applicable
ALL	21330	FAIL TO FILE FUTURE PROOF REASON UNSPECIFIED	Not Applicable
ALL	21340	FALSE CERTIFICATION	Not Applicable
ALL	21400	FAIL TO MEET OTHER REQUIREMENTS	Not Applicable
ALL	22010	ACCIDENT	Not Applicable
ALL	22020	PROPERTY DAMAGE ONLY ACC INVOLVEMENT	Not Applicable
ALL	22030	INJURY ACCIDENT INVOLVEMENT	Not Applicable
ALL	22040	FATAL ACCIDENT INVOLVEMENT	Not Applicable
ALL	22110	DRIV TO STOP AFTER PI ACC	Not Applicable
ALL	22120	DRIV IN PI ACC TO RENDER AID AND INFO	Not Applicable
ALL	22210	DRIV TO STOP AFTER PD ACC	Not Applicable
ALL	22220	DRIV IN PD ACC TO PROVIDE INFO	Not Applicable
ALL	22300	OTHR FAIL TO RPT ACC	Not Applicable
ALL	22310	FAIL TO NOTIFY FOLLOWING DISABLING ACC	Not Applicable
ALL	22320	DRIV TO FILE WRITTEN ACC RPT WITHIN 10 DAYS	Not Applicable
ALL	22330	PERSON SHALL NOT GIVE FALSE INFO IN REQ RPT	Not Applicable
ALL	22510	FAIL TO STOP AFTER STRIKING UNATTENDED VEH	Major Violation
ALL	22520	FAIL PROVIDE INFO - UNATTENDED PROPERTY ACCI	Not Applicable
ALL	22600	FAIL TO STOP AFTER ACC - UNSPECIFIED	Major Violation
ALL	22610	FAILURE TO STOP AFTER ACCIDENT - ANIMAL	Major Violation
ALL	22700	VIOLATION RESULTING IN ACCIDENT	Not Applicable
ALL	22710	AT FAULT (CONTRIBUTE) IN PROPERTY DAMAGE ACCI	Number of Incidents
ALL	22720	AT FAULT (CONTRIBUTE) IN INJURY ACCIDENT	Number of Incidents
ALL	31100	SPEEDING, GENERALLY	Minor Violation
СТ	31100	SPEEDING, GENERALLY	Not Applicable
ALL	31110	MAXIMUM SPEED LIMIT 30 URBAN, 55 OTHR	Minor Violation
СТ	31110	MAXIMUM SPEED LIMIT 30 URBAN, 55 OTHR	Not Applicable
ALL	31120	SPEED GREATER THAN REASONABLE OR PRUDENT	Major Violation

СТ	31120	SPEED GREATER THAN REASONABLE OR PRUDENT	Not Applicable
ALL	31130	STATE SPEED ZONES AS NOTED BY SIGNS	Minor Violation
СТ	31130	STATE SPEED ZONES AS NOTED BY SIGNS	Not Applicable
ALL	31140	SPEED LIMIT AS ALTERED BY LOCAL AUTHORITIES	Minor Violation
СТ	31140	SPEED LIMIT AS ALTERED BY LOCAL AUTHORITIES	Not Applicable
ALL	31150	SPEED LIMIT FOR TRUCKS AND BUSES	Minor Violation
СТ	31150	SPEED LIMIT FOR TRUCKS AND BUSES	Not Applicable
ALL	31160	SPEED LIMIT IN SCHL ZONE	Major Violation
СТ	31160	SPEED LIMIT IN SCHL ZONE	Not Applicable
ALL	31170	ENERGY SPEED	Major Violation
СТ	31170	ENERGY SPEED	Not Applicable
СТ	31180	SPEED IN EXCESS OF 100 MPH	Not Applicable
ALL	31180	SPEED IN EXCESS OF 100 MPH	Major Violation
ALL	31210	DRIV TOO SLOW AS TO IMPEDE TRAF	Minor Violation
СТ	31210	DRIV TOO SLOW AS TO IMPEDE TRAF	Not Applicable
ALL	31220	SPEED UND POSTED MINIMUM	Minor Violation
СТ	31220	SPEED UND POSTED MINIMUM	Not Applicable
ALL	31310	SPECIAL SPEED LIMITATION FOR MCYC	Minor Violation
СТ	31310	SPECIAL SPEED LIMITATION FOR MCYC	Not Applicable
ALL	31400	SPECIAL SPEED LIMITATIONS	Minor Violation
СТ	31400	SPECIAL SPEED LIMITATIONS	Not Applicable
СТ	31410	SPEED LIMIT IN CONST/WORK ZONE	Not Applicable
ALL	31410	SPEED LIMIT IN CONST/WORK ZONE	Major Violation
ALL	31420	SPECIAL SPEED LIMIT ON BRIDGES	Major Violation
СТ	31420	SPECIAL SPEED LIMIT ON BRIDGES	Not Applicable
ALL	31610	RACING OR PARTICIPATING IN ANY MANNER IN RACE	Major Violation
ALL	31620	PREARRANGED RACING	Major Violation
ALL	32010	RIGHT OF WAY	Minor Violation
ALL	32100	FAIL TO YLD UNSPECIFIED, OTHER	Minor Violation
ALL	32110	FAIL TO YLD R.O.W. AT INTSCT	Minor Violation
ALL	32120	LT TURNING VEH TO YLD TO APPROACHING TRAF	Minor Violation
ALL	32130	FAIL TO OBEY YLD SIGN	Minor Violation
ALL	32140	VEH ENTERING FROM PVT RD/DRIVEWAY TO YLD	Minor Violation

# Exhibit A

					Date: 5/6/2024	
Spa	ace Reserved for Insurance Dep	artment Use			Insurer Rate Filit Adoption of Advisory Organization Prospective Loss Cos Reference Filing Adoption For	on sts
1.	INSURER NAME & ADDRI	ESS Berkley Ca	sualty Company			
		11201 Dou	<u> </u>			
		<u>Urbandale,</u>	IA 53022			_
	PERSON RESPONSIBLE FO	OR FILING Paula	a Rossman			
	TITLE State Filings Ana	yst		TELEPHO	o <sub>NE</sub> # <u>3</u> 10-893-0033	
2.	INSURER NAIC # 0098-15	911				
3.	LINE OF INSURANCE 20	.0 Commercial A	uto			
4.	ADVISORY ORGANIZATION	ON Insurance S	ervices Office, Inc.			
5.	ADVISORY ORGANIZATION	ON REFERENCE	FILING# CA-2023-BRLA	A1,CA-2023-BRLC1		
6.		ned to have indepe	endently submitted as its ow	n filing the prospective loss	visory organization for this line of insurance. The costs in the captioned Loss Cost Filing.	
	and, if utilized, the expense co			the loss cost maniphers		
7.	PROPOSED RATE LEVEL	CHANGE 0	%	EFFECTIVE DATE	11/01/2024	
8.	PRIOR RATE LEVEL CHAI	NGE <u>-4.8</u>	%	EFFECTIVE DATE	03/15/2024	
11.	ATTACH "SUMMARY OF (Use a separate Summary for					
10.	organization's prospective los apply to polici	reby files to have it prospective loss costs and the insets written on or after	osts for this line of insuranc urer's loss cost multipliers a	e. The insurer's rates will b nd, if utilized, expense con- dvisory organization's pros	ts be applicable to future revisions of the advisory e the combination of the advisory organization's stants specified in the attachments. The rates will pective loss costs. This authorization is effective	
		reby files to have it deference Filing.	ts loss cost multipliers and,	if utilized, expense constan	ts be applicable only to the above Advisory	

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Insurer Name:	Berkley Casualty Company
NAIC Number:	0098-15911

Date: 5/6/2024

# **Insurer Rate Filing**

			Adoption of Advisory Organization Pr Summary of Supporting Infor		
			CALCULATION OF COMPANY LOSS	COST MULTIPLIER	
1.	Lin 20.0	e, Subl ) Comr	ine, Coverage, Territory, Class, etc. combination to which mercial Auto, 20.0000 Commercial Auto Combinations	n this page applies: s, Liability (Non-Zone-Rated)	
2.	Los A.	ss Cost The (CH	the captioned loss cost filing:		
			Without modification. (factor = 1.000)		
		×	With the following modification(s). (Cite the nature at attach supporting data and/or rationale for the modification of the mo		
	В.		Cost Modification Expressed as a Factor: examples below.)	0.809	
No	OTE:		ense Constants Are Utilized, Attach "Expense Constant orting Information. Do Not Complete Items 3-7 Below.	ts Are Utilized, Attach Constant Supplement	t" <b>Or Othe</b> r
3.	Dev	elopme	nt of Expected Loss Ratio. (Attach exhibit detailing insurer exp	ense data and/or other supporting information or	both.)
	Sele	ected Pro	ovisions		
	В. С.	Gener Taxes Under	Production Expense al Expense , Licenses & Fees writing Profit & Contingencies (explain)	14.5 11.0 2.5 5.0 0.0	% 
	F.	TOTA	· •	33.0	%
4A. 4B.			d Loss Ratio: ELR = 100% - 3F = decimal form =	67.0 0.670	
5.	Com	pany F	ormula Loss Cost Multiplier: (2B ÷ 4B) =	1.207	
6.			elected Loss Cost Multiplier = any differences between 5 and 6:	1.207	_
7.			change for the coverages to which this page applies	0	%
Exam	ple 1: I	Loss Cos	st modification factor: If your company's loss cost modification	is - 10%, a factor of .90 (1.000100) should be u	ısed.

Example 2: Loss Cost modification factor: If your company's loss cost modification of +15%, a factor of 1.15 (1.000 + .150) should be used.

# Exhibit A

					Date: 5/6/2024	
Spa	ace Reserved for Insurance Dep	artment Use			Insurer Rate Filit Adoption of Advisory Organization Prospective Loss Cos Reference Filing Adoption For	on sts
1.	INSURER NAME & ADDRI	ESS Berkley Ca	sualty Company			
		11201 Dou	<u> </u>			
		<u>Urbandale,</u>	IA 53022			_
	PERSON RESPONSIBLE FO	OR FILING Paula	a Rossman			
	TITLE State Filings Ana	yst		TELEPHO	o <sub>NE</sub> # <u>3</u> 10-893-0033	
2.	INSURER NAIC # 0098-15	911				
3.	LINE OF INSURANCE 20	.0 Commercial A	uto			
4.	ADVISORY ORGANIZATION	ON Insurance S	ervices Office, Inc.			
5.	ADVISORY ORGANIZATION	ON REFERENCE	FILING# CA-2023-BRLA	A1,CA-2023-BRLC1		
6.		ned to have indepe	endently submitted as its ow	n filing the prospective loss	visory organization for this line of insurance. The costs in the captioned Loss Cost Filing.	
	and, if utilized, the expense co			the loss cost maniphers		
7.	PROPOSED RATE LEVEL	CHANGE 0	%	EFFECTIVE DATE	11/01/2024	
8.	PRIOR RATE LEVEL CHAI	NGE <u>-4.8</u>	%	EFFECTIVE DATE	03/15/2024	
11.	ATTACH "SUMMARY OF (Use a separate Summary for					
10.	organization's prospective los apply to polici	reby files to have it prospective loss costs and the insets written on or after	osts for this line of insuranc urer's loss cost multipliers a	e. The insurer's rates will b nd, if utilized, expense con- dvisory organization's pros	ts be applicable to future revisions of the advisory e the combination of the advisory organization's stants specified in the attachments. The rates will pective loss costs. This authorization is effective	
		reby files to have it deference Filing.	ts loss cost multipliers and,	if utilized, expense constan	ts be applicable only to the above Advisory	

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Insurer Name:	Berkley Casualty Company
NAIC Number:	0098-15911

Date: 5/6/2024

#### Insurer Rate Filing Adoption of Advisory Organization Prospective Loss Costs Summary of Supporting Information Form

			Adoption of Advisory Organization Pros Summary of Supporting Informa		
			CALCULATION OF COMPANY LOSS C	OST MULTIPLIER	
1.	Lin 20.0	e, Subli ) Comn	ne, Coverage, Territory, Class, etc. combination to which t nercial Auto, 20.0000 Commercial Auto Combinations,	his page applies: Liability (Zone-Rated)	
2.	Los A.	The	Modification: insurer hereby files to adopt the prospective loss costs in th ECK ONE)	e captioned loss cost filing:	
			Without modification. (factor = 1.000)		
		×	With the following modification(s). (Cite the nature and attach supporting data and/or rationale for the modification)		
	В.		Cost Modification Expressed as a Factor: examples below.)	CALCULATION OF COMPANY LOSS COST MULTIPLIER  age, Territory, Class, etc. combination to which this page applies: to, 20.0000 Commercial Auto Combinations, Liability (Zone-Rated)  on: eby files to adopt the prospective loss costs in the captioned loss cost filing: ) modification. (factor = 1.000) e following modification(s). (Cite the nature and percent modification, and apporting data and/or rationale for the modification.)  iffication Expressed as a Factor: below.)  tants Are Utilized, Attach "Expense Constants Are Utilized, Attach Constant Supplermation. Do Not Complete Items 3-7 Below.  ed Loss Ratio. (Attach exhibit detailing insurer expense data and/or other supporting information.)  Expense  44.5 11.0 2.5 2.5 3.0 0.0 33.0  io: ELR = 100% - 3F = 67.0 0.670  m = 0.670  ses Cost Multiplier: (2B ÷ 4B) = 1.210 ences between 5 and 6:	
No	OTE:		ense Constants Are Utilized, Attach "Expense Constants rting Information. Do Not Complete Items 3-7 Below.	Are Utilized, Attach Constant Supplem	ent" Or Other
3.	Dev	elopmer	nt of Expected Loss Ratio. (Attach exhibit detailing insurer exper	nse data and/or other supporting information	or both.)
	Sele	ected Pro	visions		
	В. С.	Genera Taxes, Under	Production Expense al Expense Licenses & Fees writing Profit & Contingencies (explain)	11.0 2.5 5.0	% % % %
	F.	TOTA	` <del>-</del>	33.0	%
4A. 4B.			d Loss Ratio: ELR = 100% - 3F = decimal form =	67.0 0.670	
5.	Com	pany Fo	ormula Loss Cost Multiplier: (2B ÷ 4B) =	1.210	
6.			elected Loss Cost Multiplier = any differences between 5 and 6:	<u>1.210</u>	<u>—</u>
7.			change for the coverages to which this page applies		%
Exam	ple 1: I	Loss Cos	t modification factor: If your company's loss cost modification is	- 10%, a factor of .90 (1.000100) should be	oe used.

Example 1: Loss Cost modification factor: If your company's loss cost modification is - 10%, a factor of .90 (1.000 - .100) should be used. Example 2: Loss Cost modification factor: If your company's loss cost modification of +15%, a factor of 1.15 (1.000 + .150) should be used.

#### Exhibit A

Date: 5/6/2024 **Insurer Rate Filing** Space Reserved for Insurance Department Use **Adoption of Advisory Organization Prospective Loss Costs Reference Filing Adoption Form Berkley Casualty Company** 1. INSURER NAME & ADDRESS 11201 Douglas Ave Urbandale, IA 53022 PERSON RESPONSIBLE FOR FILING Paula Rossman TELEPHONE # 310-893-0033 State Filings Analyst TITLE INSURER NAIC # 0098-15911 3. LINE OF INSURANCE 20.0 Commercial Auto ADVISORY ORGANIZATION Insurance Services Office, Inc. ADVISORY ORGANIZATION REFERENCE FILING# CA-2023-BRLA1,CA-2023-BRLC1 The above insurer hereby declares that it is a member, subscriber or service purchaser of the named advisory organization for this line of insurance. The insurer hereby files to be deemed to have independently submitted as its own filing the prospective loss costs in the captioned Loss Cost Filing. The insurer's rates will be the combination of the prospective loss costs and the loss cost multipliers and, if utilized, the expense constants specified in the attachments. 11/01/2024 7. PROPOSED RATE LEVEL CHANGE EFFECTIVE DATE 03/15/2024 8. PRIOR RATE LEVEL CHANGE EFFECTIVE DATE 11. ATTACH "SUMMARY OF SUPPORTING INFORMATION FORM" (Use a separate Summary for each insurer-selected loss cost multiplier.) 10. CHECK ONE OF THE FOLLOWING: The insurer hereby files to have its loss cost multipliers and, if utilized, expense constants be applicable to future revisions of the advisory organization's prospective loss costs for this line of insurance. The insurer's rates will be the combination of the advisory organization's prospective loss costs and the insurer's loss cost multipliers and, if utilized, expense constants specified in the attachments. The rates will apply to policies written on or after the effective date of the advisory organization's prospective loss costs. This authorization is effective until disapproved by the Director, or amended or withdrawn by the insurer.  $\mathbf{x}$ The insurer hereby files to have its loss cost multipliers and, if utilized, expense constants be applicable only to the above Advisory Organization Reference Filing.

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Insurer Name:	Berkley Casualty Company
NAIC Number:	0098-15911

Date: <u>5/6/2024</u>

# Insurer Rate Filing

B. General Expense C. Taxes, Licenses & Fees D. Underwriting Profit & Contingencies E. Other (explain)  F. TOTAL  4A. Expected Loss Ratio: ELR = 100% - 3F = 64.8 4B. ELR in decimal form = 0.648  5. Company Formula Loss Cost Multiplier: (2B ÷ 4B) = 1.346  6. Company Selected Loss Cost Multiplier = Explain any differences between 5 and 6:				Summary of Supporting Information Form	55 CUSIS	
20.0 Commercial Auto, 20.0000 Commercial Auto Combinations, Physical Damage (Non-Zone-Rated)  2. Loss Cost Modification:  A. The insurer hereby files to adopt the prospective loss costs in the captioned loss cost filing: (CHECK ONE)    Without modification. (factor = 1.000)    With the following modification(s). (Cite the nature and percent modification, and attach supporting data and/or rationale for the modification.)    B. Loss Cost Modification Expressed as a Factor: (See examples below.)    NOTE: If Expense Constants Are Utilized, Attach "Expense Constants Are Utilized, Attach Constant Supplement" Or Supporting Information. Do Not Complete Items 3-7 Below.  3. Development of Expected Loss Ratio. (Attach exhibit detailing insurer expense data and/or other supporting information or both.)    Selected Provisions   A. Total Production Expense   14.5				CALCULATION OF COMPANY LOSS COST MULT	TIPLIER	
A. The insurer hereby files to adopt the prospective loss costs in the captioned loss cost filing: (CHECK ONE)  Without modification. (factor = 1.000)  With the following modification(s). (Cite the nature and percent modification, and attach supporting data and/or rationale for the modification.)  B. Loss Cost Modification Expressed as a Factor: (See examples below.)  NOTE: If Expense Constants Are Utilized, Attach "Expense Constants Are Utilized, Attach Constant Supplement" Or Supporting Information. Do Not Complete Items 3-7 Below.  3. Development of Expected Loss Ratio. (Attach exhibit detailing insurer expense data and/or other supporting information or both.)  Selected Provisions  A. Total Production Expense B. General Expense C. Taxes, Licenses & Fees D. Underwriting Profit & Contingencies E. Other (explain)  F. TOTAL  4A. Expected Loss Ratio: ELR = 100% - 3F = 64.8  4B. ELR in decimal form = 64.8  5. Company Formula Loss Cost Multiplier: (2B ÷ 4B) = 1.346  6. Company Selected Loss Cost Multiplier = Explain any differences between 5 and 6:	1	. Lin 20.0	e, Subli ) Comn	ne, Coverage, Territory, Class, etc. combination to which this page appercial Auto, 20.0000 Commercial Auto Combinations, Physical D	oplies: Damage (Non-Zone-Rated)	
With the following modification(s). (Cite the nature and percent modification, and attach supporting data and/or rationale for the modification.)  B. Loss Cost Modification Expressed as a Factor: (See examples below.)  NOTE: If Expense Constants Are Utilized, Attach "Expense Constants Are Utilized, Attach Constant Supplement" Or Supporting Information. Do Not Complete Items 3-7 Below.  3. Development of Expected Loss Ratio. (Attach exhibit detailing insurer expense data and/or other supporting information or both.)  Selected Provisions  A. Total Production Expense B. General Expense C. Taxes, Licenses & Fees D. Underwriting Profit & Contingencies E. Other (explain) F. TOTAL  35.2  4A. Expected Loss Ratio: ELR = 100% - 3F = 64.8 4B. ELR in decimal form = 0.648  5. Company Formula Loss Cost Multiplier: (2B ÷ 4B) = 1.346  6. Company Selected Loss Cost Multiplier = Explain any differences between 5 and 6:	2		The	insurer hereby files to adopt the prospective loss costs in the captione	d loss cost filing:	
B. Loss Cost Modification Expressed as a Factor: (See examples below.)  NOTE: If Expense Constants Are Utilized, Attach "Expense Constants Are Utilized, Attach Constant Supplement" Or Supporting Information. Do Not Complete Items 3-7 Below.  3. Development of Expected Loss Ratio. (Attach exhibit detailing insurer expense data and/or other supporting information or both.)  Selected Provisions  A. Total Production Expense B. General Expense C. Taxes, Licenses & Fees D. Underwriting Profit & Contingencies E. Other (explain) F. TOTAL  4A. Expected Loss Ratio: ELR = 100% - 3F = 64.8 4B. ELR in decimal form = 0.648  Company Formula Loss Cost Multiplier: (2B ÷ 4B) = 1.346  6. Company Selected Loss Cost Multiplier = 1.346  Explain any differences between 5 and 6:				Without modification. (factor = 1.000)		
NOTE: If Expense Constants Are Utilized, Attach "Expense Constants Are Utilized, Attach Constant Supplement" Or Supporting Information. Do Not Complete Items 3-7 Below.  3. Development of Expected Loss Ratio. (Attach exhibit detailing insurer expense data and/or other supporting information or both.)  Selected Provisions  A. Total Production Expense B. General Expense C. Taxes, Licenses & Fees D. Underwriting Profit & Contingencies E. Other (explain) F. TOTAL  4A. Expected Loss Ratio: ELR = 100% - 3F = 64.8 4B. ELR in decimal form = 0.648  5. Company Formula Loss Cost Multiplier: (2B ÷ 4B) = 1.346  6. Company Selected Loss Cost Multiplier = 1.346  Explain any differences between 5 and 6:			×		odification, and	
Supporting Information. Do Not Complete Items 3-7 Below.  3. Development of Expected Loss Ratio. (Attach exhibit detailing insurer expense data and/or other supporting information or both.)  Selected Provisions  A. Total Production Expense B. General Expense C. Taxes, Licenses & Fees D. Underwriting Profit & Contingencies E. Other (explain) F. TOTAL  35.2  4A. Expected Loss Ratio: ELR = 100% - 3F = 64.8 ELR in decimal form = 0.648  5. Company Formula Loss Cost Multiplier: (2B ÷ 4B) = 1.346  6. Company Selected Loss Cost Multiplier = 1.346  Explain any differences between 5 and 6:		В.			0.872	2 <u>%</u> 2% 2% 2% 2% 2%
A. Total Production Expense   14.5     B. General Expense   2.2     C. Taxes, Licenses & Fees   2.2     D. Underwriting Profit & Contingencies     E. Other (explain)   0.0     F. TOTAL   35.2    4A. Expected Loss Ratio: ELR = 100% - 3F = 64.8     4B. ELR in decimal form = 0.648    5. Company Formula Loss Cost Multiplier: (2B ÷ 4B) = 1.346    6. Company Selected Loss Cost Multiplier = 1.346     Explain any differences between 5 and 6:	N	OTE:			ed, Attach Constant Supplement" Or (	Other
B. General Expense       11.0         C. Taxes, Licenses & Fees       2.2         D. Underwriting Profit & Contingencies       7.5         E. Other (explain)       0.0         F. TOTAL       35.2         4A. Expected Loss Ratio: ELR = 100% - 3F = ELR in decimal form =       64.8         5. Company Formula Loss Cost Multiplier: (2B ÷ 4B) =       1.346         6. Company Selected Loss Cost Multiplier = Explain any differences between 5 and 6:       1.346	3		-		the captioned loss cost filing:  1. The captioned loss cost filing	
4A. Expected Loss Ratio: ELR = 100% - 3F = 4B. ELR in decimal form =  5. Company Formula Loss Cost Multiplier: (2B ÷ 4B) =  6. Company Selected Loss Cost Multiplier = Explain any differences between 5 and 6:		B. C. D.	Genera Taxes, Underv	al Expense Licenses & Fees writing Profit & Contingencies	11.0 2.2 7.5	/o /o /o
4B. ELR in decimal form =   5. Company Formula Loss Cost Multiplier: (2B ÷ 4B) =   6. Company Selected Loss Cost Multiplier =  Explain any differences between 5 and 6:   1.346		F.	TOTA	L	35.2	<b>%</b>
6. Company Selected Loss Cost Multiplier = 1.346 Explain any differences between 5 and 6:						
Explain any differences between 5 and 6:	5.	Com	pany Fo	ormula Loss Cost Multiplier: (2B ÷ 4B) =	1.346	
7. Rate Level change for the coverages to which this page applies 0	6.			•	1.346	
	7.	Rate	Level c	change for the coverages to which this page applies	0 9	⁄ <sub>0</sub>

Example 1: Loss Cost modification factor: If your company's loss cost modification is - 10%, a factor of .90 (1.000 - .100) should be used. Example 2: Loss Cost modification factor: If your company's loss cost modification of +15%, a factor of 1.15 (1.000 + .150) should be used.

# SMALL BUSINESS TRANSPORTATION PROGRAM - COMMERCIAL AUTOMOBILE COVERAGES

### **ACTUARIAL MEMORANDUM**

#### OHIO

With this filing, we are introducing the following rule revision for our Small Business Transportation Auto Program.

The company wishes to revise Commercial Auto Rule 25. PREMIUM DEVELOPMENT - ZONE-RATED AUTOS. The loss costs for zone-rated vehicles will be determined based on the vehicle's garaging zip code and state. All methods and statistics used in the development of the rules are standard practice used within the industry.

#### Exhibit A

Date: 5/6/2024 **Insurer Rate Filing** Space Reserved for Insurance Department Use **Adoption of Advisory Organization Prospective Loss Costs Reference Filing Adoption Form Berkley Casualty Company** 1. INSURER NAME & ADDRESS 11201 Douglas Ave Urbandale, IA 53022 PERSON RESPONSIBLE FOR FILING Paula Rossman TELEPHONE # 310-893-0033 State Filings Analyst TITLE INSURER NAIC # 0098-15911 3. LINE OF INSURANCE 20.0 Commercial Auto ADVISORY ORGANIZATION Insurance Services Office, Inc. ADVISORY ORGANIZATION REFERENCE FILING# CA-2023-BRLA1,CA-2023-BRLC1 The above insurer hereby declares that it is a member, subscriber or service purchaser of the named advisory organization for this line of insurance. The insurer hereby files to be deemed to have independently submitted as its own filing the prospective loss costs in the captioned Loss Cost Filing. The insurer's rates will be the combination of the prospective loss costs and the loss cost multipliers and, if utilized, the expense constants specified in the attachments. 11/01/2024 7. PROPOSED RATE LEVEL CHANGE EFFECTIVE DATE 03/15/2024 8. PRIOR RATE LEVEL CHANGE EFFECTIVE DATE 11. ATTACH "SUMMARY OF SUPPORTING INFORMATION FORM" (Use a separate Summary for each insurer-selected loss cost multiplier.) 10. CHECK ONE OF THE FOLLOWING: The insurer hereby files to have its loss cost multipliers and, if utilized, expense constants be applicable to future revisions of the advisory organization's prospective loss costs for this line of insurance. The insurer's rates will be the combination of the advisory organization's prospective loss costs and the insurer's loss cost multipliers and, if utilized, expense constants specified in the attachments. The rates will apply to policies written on or after the effective date of the advisory organization's prospective loss costs. This authorization is effective until disapproved by the Director, or amended or withdrawn by the insurer.  $\mathbf{x}$ The insurer hereby files to have its loss cost multipliers and, if utilized, expense constants be applicable only to the above Advisory Organization Reference Filing.

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Insurer Name:	Berkley Casualty Company
NAIC Number:	0098-15911

Date: <u>5/6/2024</u>

# **Insurer Rate Filing**

			Adoption of Advisory Organization Pros Summary of Supporting Informs		
			CALCULATION OF COMPANY LOSS C	COST MULTIPLIER	
1.	Lin 20.0	e, Subli O Comr	ine, Coverage, Territory, Class, etc. combination to which the nercial Auto, 20.0000 Commercial Auto Combinations,	this page applies: Physical Damage (Zone-Rated)	
2.	Los A.	The	Modification: insurer hereby files to adopt the prospective loss costs in the ECK ONE)	ne captioned loss cost filing:	
20.0 Commercial  2. Loss Cost Modifi A. The insurer (CHECK Composition of CHECK Chec			Without modification. (factor = 1.000)		
		×	With the following modification(s). (Cite the nature and attach supporting data and/or rationale for the modification)		
	Cost Modification Expressed as a Factor: examples below.)	1.499			
NO	OTE:		ense Constants Are Utilized, Attach "Expense Constants rting Information. Do Not Complete Items 3-7 Below.	Are Utilized, Attach Constant Supplement" Or C	Ither
3.	Dev	elopme	nt of Expected Loss Ratio. (Attach exhibit detailing insurer expen	nse data and/or other supporting information or both.)	
2. 1	Sele	ected Pro	ovisions		
	B. C. D.	Generation Taxes, Under	Licenses & Fees writing Profit & Contingencies		6
	F.	TOTA	L	35.2	<b>6</b>
			d Loss Ratio: ELR = 100% - 3F = decimal form =	64.8 0.648	
5.	Com	pany F	ormula Loss Cost Multiplier: (2B ÷ 4B) =	2.314	
6.			elected Loss Cost Multiplier = any differences between 5 and 6:	2.314	
7.	Rate	Level	change for the coverages to which this page applies	0 %	⁄o
Examp	ole 1: I	Loss Cos	t modification factor: If your company's loss cost modification is		

Ex Example 2: Loss Cost modification factor: If your company's loss cost modification of +15%, a factor of 1.15 (1.000 + .150) should be used. With this filing, Berkley Casualty Company (BCC) is amending the Commercial Auto Coverages under the following program as described below.

Berkley Casualty Company – Small Business Transportation Program

BCC is a subscriber with the Insurance Services Office, Inc. (ISO) and had granted ISO filing authority on its behalf but has withdrawn that filing authority with ISO for Commercial Auto for the Small Business Transportation Program, and our intention is to non-adopt rates including loss costs, forms and rules for this program. The purpose of this submission is to introduce our new trucking model. We also will be amending our Loss Cost Multipliers for an overall rate change of 0%.

We respectfully request to implement this revision for all new and renewal policies effective on or after November 1, 2024.

Please note that this filing is mutually exclusive to all other Programs filed and approved on behalf of the above captioned companies. All other filed and approved programs for the above captioned companies remain on file without change.

With this filing we adopt:

CA-2023-OPPSR ISOF-133638280

CA-2023-BRLA1 ISOF-133928762

CA-2023-BRLC1 ISOF-133928817

CA-2023-IALL1 ISOF-133925470

CA-2021-OAMRU

CA-2021-RAMLC

CA-2021-ROCP1

CA-2019-ROCP1

CL-2019-OMJRU

CA-2023-OPPSF ISOF-133638351

CA-2021-OAMFR

CL-2019-OMJFR

# **Berkley Casualty Company**



a Berkley Company

5/17/2024

Re: Berkley Casualty Company (NAIC: 15911), (FEIN Number: 63-0866690)

**Letter of Authorization** 

TOI: 20.0 Commercial Auto / 20.00 Commercial Auto Combinations

To Whom It May Concern:

Perr&Knight is hereby authorized to submit rate/rule, rule, form filing(s) on behalf of **Berkley Casualty Company**. This authorization includes providing additional information and responding to questions regarding this filing on our behalf as necessary.

The following individuals at Perr&Knight shall have access to the filing:

Neresa Torres Stephanie Joe Paula Rossman Jeremy DeCarr Ieisha James Ashley Allen

Please direct all correspondences and inquiries related to this filing to Perr&Knight. If needed, Perr&Knight's mailing address and phone number are below:

State Filings Department Perr&Knight 401 Wilshire Blvd, Suite 960 Santa Monica, CA 90401 Phone: (888) 201-5123

Please contact me if you have any questions regarding this authorization.

Sincerely,

David A. Hanes Digitally signed by: David A. Hanes DN: CN = David A. Hanes email = dnanes@wrberkley.com C = US O = Berkley Shared Services OU = Assistant Secretary Date: 2024.05.20 09:46:48 -04'00'

David A. Hanes
Assistant Secretary
W 630-210-0374
dhanes@wrberkley.com

## Memorandum

# Loss Cost Calculation for BSB Small Trucking Zone Rating

# 1. Background

The loss cost of zone rating for BSB Small Trucking product is implemented at the level of pairs of states and 5-digit zip-codes, instead of pairs of the garaging zones and destination zones defined by ISO. Therefore, in implementation, a table, with US state name and 5-digit zip-code as the look-up key and the loss costs as the look-up values, is created for each coverage of liability, collision, comprehensive, and medical expense and for states where each coverage type applies.

# 2. Development

**Step1.** For each zip code, collect all the inspections that were performed between 2021-01-01 and 2023-12-31, pertaining to active DOT numbers found in Federal Moter Carrier Safety Administration (FMCSA) database as of 2023-12-31.

**Step 2.** Look up for the garaging zone for this zip code and the destination zone for the county where each of these inspections took place. Then a list of pairs of garaging zone and destination zone was created, where the garaging zone is the same.

**Step3.** Look up for the loss cost for each item in the list created in step 2, from original ISO's zone rating loss cost table and then calculate the straight average, called the raw zip-code loss cost.

**Step 4.** Smooth the raw zip code loss cost. There are three situations:

- a. If a zip code has neighboring zip codes that are located within 10 miles, where the distance is the great circle distance between centroids, select the top 5 closest ones. Calculate the weighted average of the raw loss cost with the count of inspections of each zip code as the weight. The result is called smoothed loss cost.
- b. If zip code does not have any neighboring zip codes that meet the criteria in (a), calculate the weighted average of raw loss cost for all zip codes from the same county, where the weight is the count of inspections. The result is called county loss cost.
- c. If there are no inspections that are found from the county, calculate the weighted average among all the zip codes from the state. The result if called state loss cost.

**Step 6.** If smoothed loss cost is available, select it. Otherwise select county loss cost if it is available and select state loss cost if not. The result is called the BSB zone rating loss cost at zip code level.

# 3. Implementation

In rating, use BSB zone loss cost at zip code level if a pair of state and zip code is found in the lookup tables. Otherwise use state loss cost.



Jon Husted, Lt Governor

# **Property-Casualty Underwriting Profit & Loss Statement**

OPRAS Division, 50 W Town Street, 3rd Floor - Suite 300, Columbus OH 43215 1-614-644-2635 | Fax 1-614-728-1280 | insurance.ohio.gov

## Five Year Statement Complete Separately for Ohio and Countrywide

Company:	Berkley Casualty Company
Program:	Small Business Transportation Program
Line:	Commercial Auto (19.3,19.4,21.2)

	Year 2024	ļ.	Year 202	23	Year 202	22	Year		Year		Total Combined	Years
	Dollars	Ratio	Dollars	Ratio	Dollars	Ratio	Dollars	Ratio	Dollars	Ratio	Dollars	Ratio
Direct Premiums Written	16,961,814		15,842,384		1,604,447						34,408,645	
Direct Premiums Earned	11,222,091		6,919,775		388,494						18,530,360	
Losses Incurred (E)*	4,220,442	37.6	3,341,003	48.3	386,516	99.5					7,947,962	42.9
Loss Adjustment Expense Incurred (E)*	296,235	2.6	148,154	2.1	45,312	11.7					489,700	2.6
Acquisition Expense Incurred (W)**	2,542,094	15.0	2,375,298	15.0	240,667	15.0					5,158,059	15.0
General Expense (E)*												
Taxes, License & Fees Incurred (W)**												
Total Loss & Expense	4,312,416		3,456,714		431,828						8,200,958	

Including commission and brokerage, field supervision, collection expense and other acquisition costs.

\*\*(W) Ratio based on Written Premium

All premiums on this exhibit are actual premiums collected (NOT adjusted to manual rates if written at a deviation).

INS4012 (Rev. 02/2021) Page 1 of 1

<sup>\*(</sup>E) Ratio based on Earned Premium



Jon Husted, Lt Governor

# **Property-Casualty Underwriting Profit & Loss Statement**

OPRAS Division, 50 W Town Street, 3rd Floor - Suite 300, Columbus OH 43215 1-614-644-2635 | Fax 1-614-728-1280 | insurance.ohio.gov

## Five Year Statement Complete Separately for Ohio and Countrywide

Company:	Berkley Casualty Company					
Program:	Small Business Transportation Program					
Line:	Commercial Auto (19.3,19.4,21.2)					

	Year 2024	4	Year 2	.023	Year		Year		Year	Year Total Combined		Years
	Dollars	Ratio	Dollars	Ratio	Dollars	Ratio	Dollars	Ratio	Dollars	Ratio	Dollars	Ratio
Direct Premiums Written	1,380,981		584,001								1,964,982	
Direct Premiums Earned	572,736		199,359								772,095	
Losses Incurred (E)*	252,327	44.1	11,159	5.6							263,486	34.1
Loss Adjustment Expense Incurred (E)*	19,622	3.4	1,313	0.7							20,934	2.7
Acquisition Expense Incurred (W)**	207,147	15.0	87,600	15.0							294,747	15.0
General Expense (E)*												
Taxes, License & Fees Incurred (W)**												
Total Loss & Expense	271,949		12,471								284,420	

Including commission and brokerage, field supervision, collection expense and other acquisition costs.

\*\*(W) Ratio based on Written Premium

All premiums on this exhibit are actual premiums collected (NOT adjusted to manual rates if written at a deviation).

INS4012 (Rev. 02/2021) Page 1 of 1

<sup>\*(</sup>E) Ratio based on Earned Premium

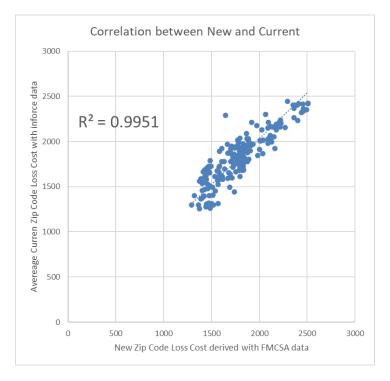
### Objection 3

#### Applies To:

#### **Comments:**

Provide support and documentation for the new state zone loss costs and state zip code costs.

A memorandum on methodology can be found in Memorandum on BSB Zone Rating Loss Cost Calculation.docx. A comparison between the new loss cost and the average of in-force book by zip code before implementation was performed. The very high correlation justified the validity of method.



Please find the attached memo.

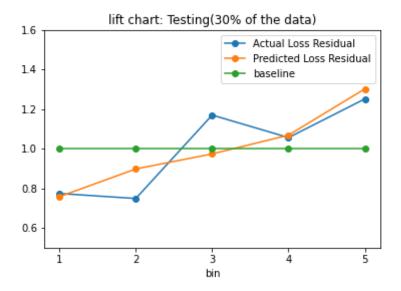
# Objection 4

#### Applies To:

#### **Comments:**

Provide support for the underwriting tier factors.

The lift chart on testing data is attached here to show the power of this model on top of the base ISO loss cost. As shown in the chart, the model can distinguish low/high risks and there is good consistency between the actual loss residual and the prediction.



#### Objection 1

### Applies To:

#### Comments:

Regarding response 7 of the previous letter, provide further details regarding the review of the insured's IFTAs and inspection patterns for reasonability of the weighted average radius class. Explain what the IFTA is and how reviewing it can support the stated expected mileage within each radius class.

IFTA stands for International Fuel Tax Agreement, which requires carriers to file a quarterly fuel tax report that details mileage information for each state. These IFTA reports are a standardized industry tool used to verify the mileage data provided by the insureds. Additionally, underwriters can review locations where inspections happened as available in the data from the Federal Motor Carrier Safety Administration (FMCSA). With IFTA reports and FMCSA inspection data, underwriters can cross-validate the radius information provided by the insureds on their applications, by calculating the distance between the garaging location and the data shown on the IFTA reports and inspection patterns.

#### Objection 2

#### Applies To:

#### Comments:

Provide further details around how and when the expected mileage within each radius classification can change or be updated for a particular vehicle. In particular, clarify whether the expected mileage within each radius can change

- 1.) On midterm amendment
- 2.) On audit
- 3.) On renewal or rewrite.

Revise and supersede as necessary.

Our practice is not to update the expected mileage on midterm amendment or audits. The information is updated on renewal or rewrite.

#### Objection 3

#### Applies To:

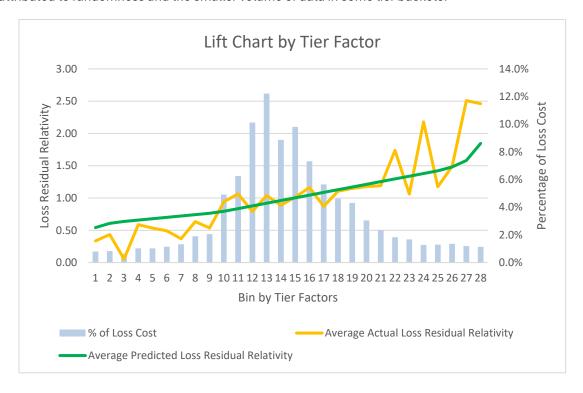
#### Comments:

The previous response to objection 4 is viewed as incomplete. The attached lift chart shows the lift using quintiles, but the factors vary down to the centile level. Provide additional details and support for the specific tier factors. Include all data, methods, and assumptions used in selecting the tier factors.

Tier factors can be found in the score-to-tier mapping table, where the model score is the product of scores by components (Prior Carrier Length, Commercial Credit Score, Driver-Power-Unit Combination, Average Number of Relevant Claims, FMCSA Quality Score, Dump Indicator, and Intermodal Indicator). The column "Tier Factor" uses the identical values from the previously approved tier model, and the columns "Lower Bound" and "Upper Bound" are obtained by shifting the values of the same columns from the previously approved tier model in such a way that the overall tier factor impact on the in-force book is neutral, i.e., the aggregate ISO loss cost before tier factors applied equals the aggregate loss cost after tier factors applied.

A refined lift chart is attached below. Bins are created with policies ordered by the tier factors from low to high so that each has as least about 1% of the total loss costs. The orange line is the average actual

loss residual relativity, while the green one is the average predicted loss residual relativity. The strong consistency between actual and predicted demonstrates the efficacy of the tier model. Reversals can be attributed to randomness and the smaller volume of data in some tier buckets.



SERFF Tracking #: BNIC-134120828 State Tracking #: BNIC-134120828 Company Tracking #: OH-CA-RARUFM-BSB

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

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Comments:					
Attachment(s):	INS4012_CW.pdf INS4012_OH.pdf				
Item Status:	Filed				
Status Date:	08/08/2024				
Satisfied - Item:	Response Letter objection 3 and 4 from 07/12/2024				
Comments:					
Attachment(s):	SERFF Response obj 3 and 4.pdf				
Item Status:	Filed				
Status Date:	08/08/2024				
Satisfied - Item:	Response letter - objection 07/31/2024				
Comments:					
Attachment(s):	Responses_OH.pdf				
Item Status:	Filed				
Status Date:	08/08/2024				

SERFF Tracking #: BNIC-134120828 State Tracking #: BNIC-134120828 Company Tracking #: OH-CA-RARUFM-BSB

State: Ohio Filing Company: Berkley Casualty Company

TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations

Product Name: Small Business Transportation Program - Commercial Auto Coverages

Project Name/Number: /

# **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.

	Schedule Item			Replacement	
<b>Creation Date</b>	Status	Schedule	Schedule Item Name	<b>Creation Date</b>	Attached Document(s)
07/24/2024	Superseded/With drawn 08/08/2024	Rate	Underwriting Tiering Guidelines	08/06/2024	BSB_Underwriting Tiering Guidelines 2.0_OH.pdf (Superceded)
05/23/2024	Superseded/With drawn 08/08/2024	Rate	Underwriting Tiering Guidelines	07/24/2024	BSB_Underwriting Tiering Guidelines 2.0.pdf (Superceded)
05/23/2024	Superseded/With drawn 08/08/2024	Supporting Document	Filing Requirements Summary - P&C	07/24/2024	Actuarial Memo - OH.pdf FM OH RARUFM.pdf
05/23/2024	Superseded/With drawn 08/08/2024	Rate	Driver Quality Factor	07/24/2024	TM 2.0 DQF Rule 08 24.pdf (Superceded)