



OFFICE OF INSURANCE REGULATION

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January 15, 2014

The Honorable Jeff Atwater
Chief Financial Officer
Florida Department of Financial Services
Plaza Level 11, The Capitol
400 South Monroe Street
Tallahassee, FL 32399-0300

Dear Chief Financial Officer Atwater:

Thank you for the opportunity to provide additional information regarding efforts by the Office of Insurance Regulation (Office) to analyze rates of homeowners insurers to make certain reinsurance cost savings are appropriately passed on to Florida policyholders.

The good news reflected in this report is that the trend in the Florida homeowners market is positive. Our analysis of the top 30 voluntary homeowners insurers in Florida shows that rates are going down, Florida homeowners are benefitting from lower reinsurance costs and the market as a whole is more robust and competitive.

Report Results

For the purposes of this review, the Office focused on the top 30 voluntary homeowners insurers, which collectively represent almost 70% of the policies written in the Florida homeowners market, based on data submitted in the Quarterly Supplemental Report (QUASRng) as of September 30, 2013. The Office focused its review on voluntary writers and has not included information for Citizens Property Insurance Corporation (Citizens).

Of the top 30 voluntary writers of homeowners insurance in Florida, 15 insurers have made required filings that contain information for the latest reinsurance contract year. Every one of those 15 insurers reflected a reduction in reinsurance costs. (See Exhibit A). Additionally, six of those insurers filed for overall decreases in homeowners rates, ranging from -2.4% to -9.2%. The name of the insurer, the amount of the decrease filed/approved and the percent of the homeowners market represented by those insurers is represented in the chart below. These results are not static and will be constantly changing as insurers make required filings with the Office.

Insurer	Change Filed/Approved	% of Policies In Force*
Universal Property and Casualty Insurance Company	-2.4%	10.0%
Security First Insurance Company	-9.2%	2.9%
American Bankers Insurance Company of Florida**	-3.6%	2.5%
ASI Preferred Insurance Company	-7.8%	1.9%
Ark Royal Insurance Company	-6.2%	1.3%
American Strategic Insurance Company	-7.8%	1.0%
Security First Insurance Company**	-4.4%	2.9%

* QUASRng data as of September 30, 2013

**Pending as of January 15, 2014

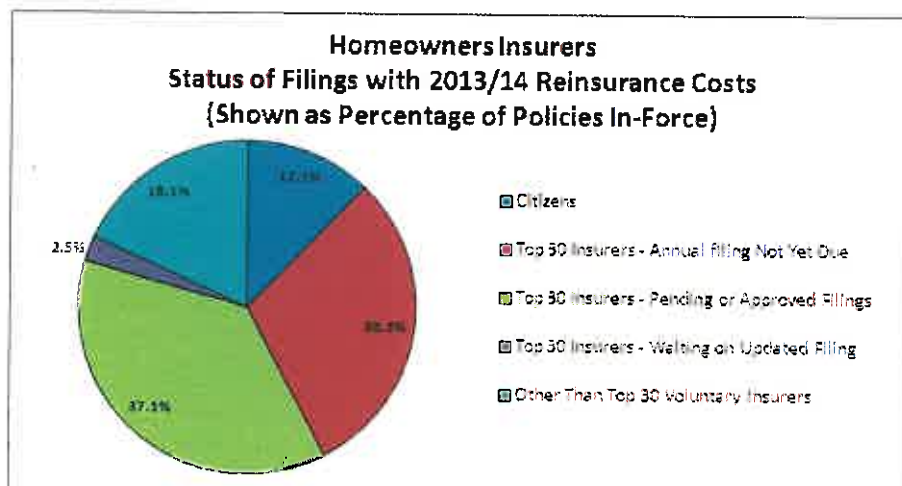
Total = 19.6%

Significantly, only two insurers of the 15 that have made required filings with the Office have received increases. Those increases, which were justified based on the company's data, were lower than they would have been after taking into account the impact of lower reinsurance costs.

Based on the analysis of the top 30 voluntary homeowners insurers:

- 15 of those insurers, representing almost 40% of the policies written in the Florida homeowners market, have submitted filings that reflect the 2013/2014 reinsurance costs. Of these:
 - 5 insurers have received approval for an overall statewide reduction in rates (see chart above);
 - 2 insurers have a pending filing with an overall statewide reduction in rates (see chart above);
 - 2 insurers have received approval for an overall statewide increase in rates;
 - 4 insurers have pending filings with an overall statewide increase in rates;
 - 2 insurers have withdrawn the most recent filing that reflected the 2013/2014 reinsurance contracts and are expected to refile soon; and
 - 1 insurer was able to support that even with the reduction in reinsurance costs, the rates currently approved are actuarially sound with no change.
- 15 insurers, representing about 30% of the policies written in the Florida homeowners market, are not yet required by law to submit annual rate filings and have not yet submitted filings that reflect 2013/2014 reinsurance costs.

The chart below demonstrates this data as a percentage of policies in force.



Under Florida law¹, an insurer writing homeowners insurance must submit an annual base rate filing no later than 12 months after the previous base rate filing. Half of the insurers that were reviewed in this analysis are not yet due for the required annual rate filing. In addition, by law, the Office may not disapprove as excessive any rate for which it has given final approval or which has been deemed approved for one year after the effective date of the filing (except in cases of material misrepresentation or material error made by the insurer in the filing.)² Each insurer submitting its annual rate filing has been, and will be required to submit the most recent reinsurance contracts to support its proposed rate change.

Analysis of Data

There are many components that make up the rate that is charged for homeowners coverage. There is no question that the cost of reinsurance is a significant factor in the ratemaking formula. However, increases in the components other than reinsurance costs (e.g. other expenses, non-catastrophe losses, sinkhole losses, projected catastrophe losses) may cause an increase in rates even when reinsurance costs are decreasing. Nonetheless, reductions in reinsurance costs do reduce expenses and therefore temper any increases caused by the other components. In each case where increased rates were granted, insurers were required to provide reinsurance information to ensure that those costs were appropriately recognized and taken into account.

The following information is a description of the Exhibits provided as supporting documentation for the analysis of the top 30 voluntary homeowners insurers in Florida:

1. Exhibit A – Summary of Analysis, is a snapshot of the rate filing status of the top 30 voluntary writers of homeowners insurance in Florida. The exhibit reflects the percentage of the homeowners market written by each company, lists when the company is required to make its annual rate filing, reflects the status of any filed or approved rate change, shows the change in reinsurance costs as a percentage, and notes whether reinsurance purchased from year to year has increased, decreased or not changed. All of the 15 insurers included in this exhibit made filings that show a decrease in reinsurance costs, and six have reduced rates overall.
2. Exhibit B – Analysis of Recent Homeowners Rate filing Information – Top 30 Voluntary Insurers, was prepared to provide a rate history of the top 30 voluntary homeowners insurers, comparing requested rate increases in 2012 to those in 2013, examining reinsurance costs from one year to the next, and analyzing trends. It is clear from this data that rates are trending downward, that reinsurance costs are lower, and that these lower costs are producing lower rates for Florida homeowners. Of the 15 insurers reflected in Exhibit B that were due to make required filings, all but one reflected lower proposed percentage rate changes for 2013 than for 2012 and the one insurer that did not, had no rate change approved.
3. Exhibit C – Notes, provides definitions of terms used and explanations of various elements of the reviewed rate filings in Exhibit B.

It is important to note that since reinsurance costs make up only a portion of the rate, a 10% decrease in reinsurance costs does not translate into a 10% decrease in total rates. For example, one insurer experienced a decrease of 26% in reinsurance costs. Since the reinsurance costs were only a portion of the overall rate (changing from 22% of the rate to 16%), the overall statewide average decrease in rates was 8%. In addition, there may be other factors in a rate indication that offset the decrease in reinsurance

¹ Section 627.0645, Florida Statutes

² Section 627.062(2)(g), Florida Statutes

costs, such as a change in expenses, trends, catastrophe models or loss experience. For example, one insurer had a decrease in reinsurance costs of 6% (changing from 13% of the rate to 12% of the rate). However, along with the decrease in reinsurance costs was an increase in other expenses which offset the reduction in reinsurance costs and supported an increase of 6%.

Each homeowners insurer in Florida must annually reevaluate the levels of reinsurance needed, the cost and availability of such coverage, and tailor its reinsurance program accordingly. Insurers may decide to purchase additional reinsurance in a time when reinsurance costs are decreasing, and many insurers did just that for the 2013-2014 hurricane season. State law actually encourages insurers to reinsure to higher levels by providing that the Office cannot disapprove a homeowners rate as excessive solely because the insurer bought catastrophic reinsurance to cover the insurer's estimated probable maximum loss up to a 250-year event.³ Reinsuring to a higher level helps ensure the solvency of insurers in Florida, allows a company to write more business, attracts capital to Florida and provides greater resources to pay catastrophic claims.

Conclusion

The analysis illustrates that homeowners rates for FY 2013-2014 are trending downward when compared to FY 2012-2013. For the entire FY 2012-2013, the Office approved nine homeowners insurance decreases and 48 increases, and 25 of those increases were for 10% or more. For the first six months of FY 2013-2014, the Office has already received 16 homeowners insurance decreases (including the six of the top 30 homeowners insurers discussed earlier). Of the 21 homeowners increases filed in the first half of this fiscal year, only five increases were for 10% or above. More required homeowners filings will come in each month and early indications are that many of these will also reflect decreases.

The trends reflected in the data compiled by the Office are encouraging. There is reason to be optimistic that the Florida homeowners market is steadily improving. Not only are rates trending downward, record depopulation of Citizens is underway, new companies are coming to Florida and competition in the homeowners market is robust. The reductions in reinsurance costs, in many instances double-digit reductions in reinsurance costs, have benefited policyholders in one of two ways. Some insurers have passed these savings on to policyholders in the form of lower rates, while others have purchased additional reinsurance to enhance claims paying ability. Barring an intervening event, the expectation is that these same positive trends will continue, therefore positioning insurers to pass savings on to policyholders in the future.

The Office is actively monitoring the homeowners market in Florida and will continue its efforts to ensure that reductions in the cost of reinsurance are appropriately reflected in homeowners rates being charged to policyholders.

I truly appreciate your interest and support of the Office's efforts and look forward to continuing to work with you and other state leaders to promote a stable and competitive homeowners insurance market in Florida.

Sincerely,


Kevin M. McCarty
Commissioner

Attachments

³ Section 627.062(2)(b)8., Florida Statutes

EXHIBIT A - SUMMARY OF ANALYSIS

Rank	Insurer Name	PIF %	Filing w/ 2013/14 Contract	Filed/App Change	Status of Filing	Change in Reins Costs *	Reinsurance Purchased From 2012/13 to 2013/14	1-in-100 Year Event **
1	UNIVERSAL PROPERTY & CASUALTY INSURANCE COMPANY	10.0%	Yes	-2.4%	APP	-15.9%	Increased	Yes
2	STATE FARM FLORIDA INSURANCE COMPANY	7.8%	Yes	6.3%	AFP	-6.1%	Decreased	Yes
3	ST. JOHNS INSURANCE COMPANY, INC.	3.3%	No - 1/31/2014				Increased	Yes
4	UNITED PROPERTY & CASUALTY INSURANCE COMPANY	3.0%	No - 2/1/2014				Increased	Yes
5	SECURITY FIRST INSURANCE COMPANY	2.8%	Yes	-9.2% -4.4%	APP PEND	-4.9% +6.4%	Increased	Yes
6	HOMEOWNERS CHOICE PROPERTY & CASUALTY INSURANCE COMPANY, INC.	2.8%	No - 2/1/2014				Increased	Yes
7	FLORIDA PENINSULA INSURANCE COMPANY	2.8%	No - 7/1/2014				Decreased	Yes
8	AMERICAN BANKERS INSURANCE COMPANY OF FLORIDA	2.5%	Yes	-3.6%	PEND	-34.4%	Increased	Yes
9	UNITED SERVICES AUTOMOBILE ASSOCIATION	2.5%	No - 7/15/2014				Approx. No Chg.	Yes
10	CASTLE KEY INDEMNITY COMPANY	2.4%	Yes	7.4%	PEND	-13.7%	Approx. No Chg.	Yes
11	TOWER HILL PRIME INSURANCE COMPANY	2.2%	No - 4/1/2014				Approx. No Chg.	Yes
12	CASTLE KEY INSURANCE COMPANY	2.2%	Yes	12.2%	PEND	-12.7%	Approx. No Chg.	Yes
13	FEDERATED NATIONAL INSURANCE COMPANY	2.2%	No - 12/31/2013				Increased	Yes
14	ASI PREFERRED INSURANCE CORP.	1.8%	Yes	-7.8%	APP	-25.8%	Increased	Yes
15	AMERICAN INTEGRITY INSURANCE COMPANY OF FLORIDA	1.8%	No - 6/15/2014				Approx. No Chg.	Yes
16	HERITAGE PROPERTY & CASUALTY INSURANCE COMPANY	1.8%	No - 8/28/2014				Approx. No Chg.	Yes
17	FLORIDA FAMILY INSURANCE COMPANY	1.8%	No - 4/1/2014				NA	Yes
18	PEOPLE'S TRUST INSURANCE COMPANY	1.5%	Yes	6.2%	PEND	-6.2%	Increased	Yes
19	TOWER HILL SIGNATURE INSURANCE COMPANY	1.4%	Yes	0.3%	APP	-13.1%	Approx. No Chg.	Yes
20	TOWER HILL PREFERRED INSURANCE COMPANY	1.4%	No - 5/1/2014				Approx. No Chg.	Yes
21	CYPRESS PROPERTY & CASUALTY INSURANCE COMPANY	1.4%	Yes	0.0%	WITH	-36.0%	Approx. No Chg.	Yes
22	ARK ROYAL INSURANCE COMPANY	1.3%	Yes	-6.2%	APP	-22.0%	Increased	Yes
23	AUTO CLUB INSURANCE COMPANY OF FLORIDA	1.2%	Yes	NO CHG	ACCEPTED	-11.4%	Decreased	Yes
24	OLYMPUS INSURANCE COMPANY	1.2%	No - 1/31/2014				Increased	Yes
25	TOWER HILL SELECT INSURANCE COMPANY	1.2%	No - 4/1/2014				Approx. No Chg.	Yes
26	USAA CASUALTY INSURANCE COMPANY	1.2%	No - 7/15/2014				Approx. No Chg.	Yes
27	GULFSTREAM PROPERTY AND CASUALTY INSURANCE COMPANY	1.1%	Yes	0.0%	WITH	-17.0%	Increased	Yes
28	AMERICAN STRATEGIC INSURANCE CORP.	1.0%	Yes	-7.8%	APP	-25.8%	Increased	Yes
29	AMERICAN MODERN INSURANCE COMPANY OF FLORIDA INC.	1.0%	No - 7/1/2012				Approx. No Chg.	Yes
30	FLORIDA FARM BUREAU CASUALTY INSURANCE COMPANY	1.0%	Yes	0.8%	PEND	-4.2%/0.8%***	Increased	Yes

69.8%

* - Based on Row (14)(E), Exhibit B - Change in total reinsurance costs expressed as percentage of previous costs.
 ** - Company is able to, with reinsurance and existing assets of the company, cover a 1 in 100 year event (hurricane that has a probability of occurrence of 1% (= 1 / 100)).
 *** - Company has submitted two filings. The withdrawn filing was determined to have a decrease in reinsurance costs. The pending filing shows an increase.

EXHIBIT B - ANALYSIS OF RECENT HOMEOWNERS RATE FILING INFORMATION - TOP 30 VOLUNTARY INSURERS*

(1) RANK	#1	#1	#1	#2	#2	#3	#4
(2) COMPANY	UNIVERSAL PROPERTY AND CASUALTY	UNIVERSAL PROPERTY AND CASUALTY	STATE FARM FLORIDA	STATE FARM FLORIDA	STATE FARM FLORIDA	ST. JOHNS HOMEOWNERS	UNITED PROPERTY AND CASUALTY
(3) OFFICE FILING NUMBER	FCP 12-16534	FCP 13-16346	FCP 12-09522	FCP 13-13542	FCP 12-12717	FCP 12-14441	
(4) TYPE OF FILING**	ARF	ARF	ARF	ARF	ARF	ARF	
(5) DATE RECEIVED	10/08/12	09/11/13	05/25/12	07/30/13	08/06/12	08/28/12	
(6) RATE COLLECTION SYSTEM							
(A) PROGRAM NAME	HOMEOWNERS	HOMEOWNERS	HOMEOWNERS	HOMEOWNERS	HOMEOWNERS	PROTECTOR	
(B) EARNED HOUSE YEARS	535,165	507,378	478,473	398,695	168,736	78,098	
(C) EARNED PREMIUMS AT CURRENT RATE LEVEL	\$795,640,730	\$846,972,293	\$913,091,781	\$747,556,631	\$303,904,397	\$184,099,038	
(D) 12 MONTHS ENDING DATE OF DATA	12/31/2011	12/31/2012	12/31/2011	12/31/2012	6/30/2011	12/31/2011	
(7) PROPOSED PERCENT CHANGE	14.8%	-2.3%	14.9%	7.2%	11.0%	14.0%	
(8) APPROVED PERCENT CHANGE ***	14.1%	-2.4%	6.0%	6.3%	11.0%	9.4%	
(9) INDICATION - COMPANY	17.7%	7.9%	15.3%	7.3%	25.5%	28.0%	
(10) INDICATION - OFFICE ***	10.2%	-0.5%	5.9%	6.6%	13.6%	9.4%	
(11) NEW BUSINESS EFFECTIVE DATE	1/18/2013	1/1/2014	12/15/2012	1/15/2014	1/1/2013	2/1/2013	
(12) RENEWAL BUSINESS EFFECTIVE DATE	3/9/2013	3/9/2014	2/1/2013	3/1/2014	4/16/2013	2/1/2013	
(13) STATUS (AFP = APPROVED FINAL PAGES)	APPROVED	APPROVED	APPROVED	AFP	APPROVED	APPROVED	
(14) REINSURANCE COST - WITH OFFICE ADJUSTMENT IF ANY							
(A) NON-FHCF REINS. COST	25.2%	20.6%	12.5%	11.2%	21.3%	28.1%	
(B) FHCF REINS. COST	1.9%	2.2%	0.6%	1.1%	1.7%	2.6%	
(C) TOTAL REINS. COST	27.1%	22.8%	13.1%	12.3%	23.0%	30.7%	
(D) REDUCTION - IN PERCENTAGE POINTS		-4.3%		-0.8%			
(E) REDUCTION - AS A PERCENTAGE OF PREVIOUS COST		-15.9%		-6.1%			
(F) REINSURANCE CONTRACT YEAR	2012/2013	2013/2014	2011/2012	2013/2014	2011/2012	2012/2013	
(G) AFFILIATES	YES	NO	YES	YES	NO	YES	
(15) HURRICANE MODEL							
(A) MODEL USED	RMS 11.0.SP2	RMS 13.0	RMS 11.0.SP2	RMS 11.0.SP2C	AIR V 12.0.1	AIR V 12.0.1	
(B) IN-FORCE DATA DATE	12/31/11	12/31/12	06/30/11	06/30/12	09/30/11	04/30/12	
(C) CHG IN RETURN TIME FROM 2012/13 CONTRACT YEAR		INCREASED		DECREASED			
(16) DUE DATE OF NEXT ANNUAL RATE FILING / CERTIFICATION		3/9/2015		1/15/2015	1/31/2014	2/1/2014	

EXHIBIT B - ANALYSIS OF RECENT HOMEOWNERS RATE FILING INFORMATION - TOP 30 VOLUNTARY INSURERS*

(1) RANK	(2) COMPANY	(3) OFFICE FILING NUMBER	(4) TYPE OF FILING**	(5) DATE RECEIVED	(6) RATE COLLECTION SYSTEM	#5	#5	#5	#5	#6	#7	#8	#8	#8	#9			
		FCP 12-20487	ARF	12/21/12		SECURITY FIRST	FCP 13-16416	ARF	09/13/13	FCP 12-11165	ARF	FCP 12-13720	ARF	08/15/12	FCP 13-00675	ARF	01/11/13	SEE NOTES
		FCP 13-22286	ARF	12/23/13		SECURITY FIRST	FCP 13-22286	ARF	12/23/13	FCP 13-01386 & 7	ARF	FCP 13-21112	ARF	11/27/13	FCP 13-00675	ARF		SEE NOTES
(A)	PROGRAM NAME	SFC VOLUNTARY HOMEOWNERS AND SFC VOLUNTARY HO-4				VOLUNTARY HOMEOWNERS PROGRAM; SFC VOLUNTARY HO-4; VOLUNTARY CONDOMINIUM UNIT OWNERS PROGRAM	VOLUNTARY HOMEOWNERS PROGRAM HO-3			HOMEOWNERS CHOICE PROPERTY & CASUALTY	FLORIDA PENINSULA	AMERICAN BANKERS INS CO OF FLORIDA	AMERICAN BANKERS INS CO OF FLORIDA					USAA HOMEOWNERS
(B)	EARNED HOUSE YEARS	106,900				132,513	107,919			55,806	90,061	86,241	94,540					SEE NOTES
(C)	EARNED PREMIUMS AT CURRENT RATE LEVEL	\$189,716,067				\$187,348,043	\$190,800,668			\$131,507,793	\$206,471,111	\$18,630,936	\$20,552,567					164,024
(D)	12 MONTHS ENDING DATE OF DATA	3/30/2012				6/30/2013	6/30/2013			4/30/2011	3/31/2012	3/31/2012	12/31/2012					\$462,652,087
(7)	PROPOSED PERCENT CHANGE	4.4%				-4.4%	-9.2%			6.0%	11.0%	4.6%	-3.8%					14.9%
(8)	APPROVED PERCENT CHANGE ***	3.1%				-9.2%	-9.2%			5.9%	11.0%	0.0%	11.7%					11.7%
(9)	INDICATION - COMPANY	6.1%				7.5%	-8.4%			17.8%	13.1%	6.3%	-8.1%					60.0%
(10)	INDICATION - OFFICE ***	5.0%				-12.2%	-12.2%			9.9%	12.7%	-0.3%	11.7%					11.7%
(11)	NEW BUSINESS EFFECTIVE DATE	6/1/2013				4/15/2014	10/15/2013			2/1/2013	7/1/2013	12/1/2012	3/1/2014					7/15/2013
(12)	RENEWAL BUSINESS EFFECTIVE DATE	6/1/2013				4/15/2014	12/1/2013			2/1/2013	7/1/2013	2/1/2013	5/1/2014					7/15/2013
(13)	STATUS (AFP = APPROVED FINAL PAGES)	APPROVED				PENDING	APPROVED			APPROVED	APPROVED	WITHDRAWN	PENDING					APPROVED
(14)	REINSURANCE COST - WITH OFFICE ADJUSTMENT IF ANY																	
(A)	NON-FHCF REINS. COST	25.2%				26.0%	23.6%			18.0%	19.1%	5.9%	3.8%					56.9%
(B)	FHCF REINS. COST	1.3%				2.2%	1.6%			6.3%	1.9%	0.2%	0.2%					0.0%
(C)	TOTAL REINS. COST	26.5%				28.2%	25.2%			24.3%	21.0%	6.1%	4.0%					56.9%
(D)	REDUCTION - IN PERCENTAGE POINTS					1.7%	-1.3%						-2.1%					
(E)	REDUCTION - AS A PERCENTAGE OF PREVIOUS COST					6.4%	-4.9%						-34.4%					
(F)	REINSURANCE CONTRACT YEAR	2012/2013				2013/2014	2013/2014			2011/2012	2012/2013	TRADE SECRET	TRADE SECRET					2012/2013
(G)	AFFILIATES	NO				NO	NO			YES	NO	NO	NO					YES
(15)	HURRICANE MODEL																	
(A)	MODEL USED	AIR V 12.0.1				EQE 2013A	AIR V 14.0.1			RMS 11.0.SP2	AIR V 12.0.1	RMS 11.0	RMS 13.0					AIR V 12.0.1
(B)	IN-FORCE DATA DATE	03/31/12				06/30/13	06/30/13			04/30/11	05/31/12	06/30/12	06/30/13					05/31/12
(C)	CHG IN RETURN TIME FROM 2012/13 CONTRACT YEAR					DECREASED	INCREASED					INCREASED	INCREASED					
(16)	DUE DATE OF NEXT ANNUAL RATE FILING / CERTIFICATION					4/15/2015				2/1/2014	7/1/2014		3/1/2015					7/15/2014

EXHIBIT B - ANALYSIS OF RECENT HOMEOWNERS RATE FILING INFORMATION - TOP 30 VOLUNTARY INSURERS*

(1) RANK	(2) COMPANY	(3) OFFICE FILING NUMBER	(4) TYPE OF FILING**	(5) DATE RECEIVED	(6) RATE COLLECTION SYSTEM	#10	#10	#10	#11	#12	#12	#12	#13
						FCP 12-10267	FCP 13-13816	FCP 12-16523	FCP 12-10266	FCP 13-13811	FCP 12-07965		FEDERATED NATIONAL SEE NOTES
						ARF	ARF	ARF	ARF	ARF	ARF		
						06/12/12	08/02/13	10/05/12	06/12/12	08/02/13	05/08/12		
(A)	PROGRAM NAME	STRATEGIC RISK MANAGEMENT	STRATEGIC RISK MANAGEMENT	THPHO	HOMEOWNERS	HOMEOWNERS	HOMEOWNERS	HOMEOWNERS	HOMEOWNERS	HOMEOWNERS	HOMEOWNERS		FEDERATED HOMEOWNERS
(B)	EARNED HOUSE YEARS	98,565	117,667	80,829	133,677	116,659							31,614
(C)	EARNED PREMIUMS AT CURRENT RATE LEVEL	\$125,180,491	\$116,533,351	\$153,751,513	\$165,629,837	\$151,970,035							\$75,842,878
(D)	12 MONTHS ENDING DATE OF DATA	6/30/2011	12/31/2012	12/31/2011	6/30/2011	12/31/2012							6/30/2011
(7)	PROPOSED PERCENT CHANGE	22.0%	7.4%	13.2%	32.4%	12.2%							7.8%
(8)	APPROVED PERCENT CHANGE ***	8.2%	7.4%	9.9%	14.9%	4.8%							4.8%
(9)	INDICATION - COMPANY	19.2%	7.4%	22.2%	29.3%	12.2%							10.4%
(10)	INDICATION - OFFICE ***	8.2%	-7.7%	9.6%	14.8%	-4.5%							5.4%
(11)	NEW BUSINESS EFFECTIVE DATE	12/2/2012	1/12/2014	4/1/2013	12/2/2012	1/12/2014							12/1/2012
(12)	RENEWAL BUSINESS EFFECTIVE DATE	12/2/2012	1/12/2014	4/1/2013	12/2/2012	1/12/2014							12/1/2012
(13)	STATUS (AFP = APPROVED FINAL PAGES)	APPROVED	PENDING	APPROVED	APPROVED	PENDING							APPROVED
(14)	REINSURANCE COST - WITH OFFICE ADJUSTMENT IF ANY												
(A)	NON-FHCF REINS. COST	22.1%	20.0%	20.1%	26.8%	24.8%							19.6%
(B)	FHCF REINS. COST	2.7%	1.4%	1.8%	3.2%	1.4%							4.1%
(C)	TOTAL REINS. COST	24.8%	21.4%	21.9%	30.0%	26.2%							23.7%
(D)	REDUCTION - IN PERCENTAGE POINTS		-3.4%			-3.8%							
(E)	REDUCTION - AS A PERCENTAGE OF PREVIOUS COST		-13.7%			-12.7%							
(F)	REINSURANCE CONTRACT YEAR	2011/2012	2012/2013	2012/2013	2011/2012	2012/2013							2011/2012
(G)	AFFILIATES	NO	NO	YES	NO	NO							NO
(15)	HURRICANE MODEL												
(A)	MODEL USED	AIR V 12.0.1	AIR V 12.0.1	AIR V 12.0.1	AIR V 12.0.1	AIR V 12.0.1							RMS V 11.0.SP2
(B)	IN-FORCE DATA DATE	01/24/12	06/02/13	12/31/11	01/24/12	06/02/13							06/30/11
(C)	CHG IN RETURN TIME FROM 2012/13 CONTRACT YEAR		NO CHANGE		NO CHANGE	NO CHANGE							
(16)	DUE DATE OF NEXT ANNUAL RATE FILING / CERTIFICATION		1/12/2015	4/1/2014		1/12/2015							12/31/2013

EXHIBIT B - ANALYSIS OF RECENT HOMEOWNERS RATE FILING INFORMATION - TOP 30 VOLUNTARY INSURERS*

(1) RANK	(2) COMPANY	#14	#14	#14	#15	#16	#17	#18	#18
(3) OFFICE FILING NUMBER		FCP 12-08308	FCP 13-13768	FCP 13-00701	FCP 13-04970	FCP 13-03342	FCP 11-18001	FCP 13-19850	
(4) TYPE OF FILING**		ARF	LIM REIN	ARF	ARF	ARF	ARF	ARF	
(5) DATE RECEIVED		05/11/12	08/02/13	01/14/13	03/18/13	02/25/13	11/12/11	11/12/13	
(6) RATE COLLECTION SYSTEM									
(A) PROGRAM NAME		SEE NOTES	SEE NOTES	AIIC VOLUNTARY HOME	SELECT HOMEOWNERS POLICY	FFI PREFERRED HOMEOWNER	SEE NOTES	SEE NOTES	
(B) EARNED HOUSE YEARS		185,230	182,226	32,801	101,155	74,514	29,871	26,985	
(C) EARNED PREMIUMS AT CURRENT RATE LEVEL		\$258,148,348	\$251,426,725	\$41,942,097	\$208,712,164	\$89,375,799	\$51,727,840	\$56,988,063	
(D) 12 MONTHS ENDING DATE OF DATA		12/31/2011	6/30/2013	3/31/2012	12/4/2012	12/31/2012	12/31/2010	12/31/2012	
(7) PROPOSED PERCENT CHANGE		4.3%	-7.8%	9.5%	10.3%	-3.3%	8.7%	6.2%	
(8) APPROVED PERCENT CHANGE ***		4.3%	-7.8%	9.5%	5.0%	-3.3%	8.4%	7.3%	
(9) INDICATION - COMPANY		12.4%	-8.2%	25.8%	6.1%	-1.8%	13.0%	7.3%	
(10) INDICATION - OFFICE ***		14.1%	-8.0%	17.3%	6.1%	0.6%	11.9%	7.3%	
(11) NEW BUSINESS EFFECTIVE DATE		9/15/2012	9/15/2013	6/15/2013	8/28/2013	4/1/2013	6/1/2012	2/11/2014	
(12) RENEWAL BUSINESS EFFECTIVE DATE		11/15/2012	11/15/2013	6/15/2013	8/28/2013	6/1/2013	8/1/2012	2/11/2014	
(13) STATUS (APP = APPROVED FINAL PAGES)		APPROVED	APPROVED	APPROVED	APPROVED	APPROVED	APPROVED	PENDING	
(14) REINSURANCE COST - WITH OFFICE ADJUSTMENT IF ANY									
(A) NON-FHCF REINS. COST		20.9%	14.5%	25.9%	TRADE SECRET	22.5%	15.0%	13.0%	
(B) FHCF REINS. COST		0.8%	1.6%	2.1%	TRADE SECRET	0.7%	6.1%	6.8%	
(C) TOTAL REINS. COST		21.7%	16.1%	28.0%	TRADE SECRET	23.2%	21.1%	19.8%	
(D) REDUCTION - IN PERCENTAGE POINTS			-5.6%					-1.3%	
(E) REDUCTION - AS A PERCENTAGE OF PREVIOUS COST			-25.8%					-6.2%	
(F) REINSURANCE CONTRACT YEAR		2011/2012	2013/2014	2012/2013	TRADE SECRET	2012/2013	2011/2012	2013/2014	
(G) AFFILIATES		YES	YES	NO	TRADE SECRET	NO	YES	YES	
(15) HURRICANE MODEL									
(A) MODEL USED		RMS 11.0.SP2	AIR V 13.0.4	AIR 12.0.1	AIR V 12.0.1	AIR V 12.0.1	AIR 12.0.4	EQE FL 2013	
(B) IN-FORCE DATA DATE		12/31/11	06/30/13	03/31/12	TRADE SECRET	09/30/12	04/30/11	06/30/13	
(C) CHG IN RETURN TIME FROM 2012/13 CONTRACT YEAR			INCREASED						
(16) DUE DATE OF NEXT ANNUAL RATE FILING / CERTIFICATION		9/15/2013		6/15/2014	8/28/2014	4/1/2014		2/11/2015	

EXHIBIT B - ANALYSIS OF RECENT HOMEOWNERS RATE FILING INFORMATION - TOP 30 VOLUNTARY INSURERS*

(1) RANK	(2) COMPANY	(3) OFFICE FILING NUMBER	(4) TYPE OF FILING**	(5) DATE RECEIVED	(6) RATE COLLECTION SYSTEM	#19	#19	#19	#20	#21	#21	#21	#22	#22	#22	#23
		TOWER HILL SIGNATURE (FORMERLY ROYAL PALM)	TOWER HILL SIGNATURE	TOWER HILL SIGNATURE	TOWER HILL PREFERRED	CYPRESS PROPERTY AND CASUALTY	CYPRESS PROPERTY AND CASUALTY	CYPRESS PROPERTY AND CASUALTY	ARK ROYAL	ARK ROYAL	ARK ROYAL	ARK ROYAL	ARK ROYAL	ARK ROYAL	ARK ROYAL	AUTO CLUB INS CO OF FLORIDA
		FCP 10-21441	FCP 13-11602	FCP 13-13833	FCP 12-20157	FCP 12-07401	FCP 13-13833	FCP 12-12092	FCP 12-15380	FCP 13-15456	FCP 12-12092	FCP 13-13833	FCP 12-12092	FCP 13-15456	FCP 12-12092	
		ARF	ARF	ARF	ARF	ARF	ARF	ARF	ARF	LIM REIN	ARF	ARF	ARF	LIM REIN	ARF	
		12/27/10	06/21/13	08/05/13	12/14/12	04/27/12	08/05/13		09/14/12	08/21/13				08/21/13	07/24/12	
		RPI HO	RPI HO	RPI HO	THRHO	CYPRESS HOMEOWNERS	CYPRESS HOMEOWNERS		ARK ROYAL HOMEOWNERS	ARK ROYAL HOMEOWNERS		CYPRESS HOMEOWNERS	ARK ROYAL HOMEOWNERS	ARK ROYAL HOMEOWNERS		PACKAGE POLICY
(B)	EARNED HOUSE YEARS	74,696	55,972	61,345	62,756	50,948	61,345		46,911	54,198		61,345	46,911	54,198		41,663
(C)	EARNED PREMIUMS AT CURRENT RATE LEVEL	\$132,639,236	\$102,441,139	\$83,369,720	\$136,566,853	\$67,723,438	\$83,369,720		\$69,649,798	\$81,511,543		\$83,369,720	\$69,649,798	\$81,511,543		\$62,377,242
(D)	12 MONTHS ENDING DATE OF DATA	7/31/2010	9/30/2012	12/31/2011	12/31/2011	9/30/2011	12/31/2012		6/30/2012	6/30/2013		12/31/2012	6/30/2012	6/30/2013		5/31/2012
(7)	PROPOSED PERCENT CHANGE	12.4%	0.4%		10.8%	17.4%	9.3%		8.4%	-6.2%		9.3%	8.4%	-6.2%		11.5%
(8)	APPROVED PERCENT CHANGE ***	12.4%	0.3%		10.7%	15.7%	0.0%		7.0%	-6.2%		0.0%	7.0%	-6.2%		11.0%
(9)	INDICATION - COMPANY	21.5%	10.1%		21.8%	21.5%	11.1%		9.4%	-8.2%		11.1%	9.4%	-8.2%		28.1%
(10)	INDICATION - OFFICE ***	15.4%	-0.2%		10.7%	15.8%	-3.1%		7.0%	-8.0%		-3.1%	7.0%	-8.0%		16.4%
(11)	NEW BUSINESS EFFECTIVE DATE	4/1/2011	1/1/2014		5/1/2013	9/1/2012	11/1/2013		1/15/2013	10/5/2013		11/1/2013	1/15/2013	10/5/2013		1/1/2013
(12)	RENEWAL BUSINESS EFFECTIVE DATE	4/1/2011	1/1/2014		5/1/2013	10/15/2012	12/15/2013		3/15/2013	12/5/2013		12/15/2013	3/15/2013	12/5/2013		1/1/2013
(13)	STATUS (AFP = APPROVED FINAL PAGES)	APPROVED	APPROVED		APPROVED	APPROVED	WITHDRAWN		APPROVED	APPROVED		APPROVED	APPROVED	APPROVED		APPROVED
(14)	REINSURANCE COST - WITH OFFICE ADJUSTMENT IF ANY															
(A)	NON-FHCF REINS. COST	26.5%	22.5%		26.2%	23.2%	15.5%		20.7%	14.8%		15.5%	20.7%	14.8%		19.5%
(B)	FHCF REINS. COST	1.8%	2.1%		1.7%	4.0%	1.9%		1.6%	2.6%		1.9%	1.6%	2.6%		1.6%
(C)	TOTAL REINS. COST	28.3%	24.6%		27.9%	27.2%	17.4%		22.3%	17.4%		17.4%	22.3%	17.4%		21.1%
(D)	REDUCTION - IN PERCENTAGE POINTS		-3.7%				-9.8%			-4.9%		-9.8%		-4.9%		
(E)	REDUCTION - AS A PERCENTAGE OF PREVIOUS COST		-13.1%				-36.0%			-22.0%		-36.0%		-22.0%		
(F)	REINSURANCE CONTRACT YEAR	2010/2011	2013/2014		2012/2013	2011/2012	2013/2014		2012/2013	2013/2014		2013/2014	2012/2013	2013/2014		2012/2013
(G)	AFFILIATES	NO	YES		YES	NA	NO		NO	NO		NO	NO	NO		NO
(15)	HURRICANE MODEL															
(A)	MODEL USED	AIR V 12.0.1	AIR V 12.0.1		AIR V 12.0.1	AIR V 12.0.1	AIR V 12.0.1		AIR V 12.0.1	AIR V 12.0.1		AIR V 12.0.1	AIR V 12.0.1	AIR V 12.0.1		AIR V 12.0.1
(B)	IN-FORCE DATA DATE	07/31/10	09/30/12		12/31/11	09/30/11	12/31/12		06/30/12	08/31/13		12/31/12	06/30/12	08/31/13		02/29/12
(C)	CHG IN RETURN TIME FROM 2012/13 CONTRACT YEAR		NO CHANGE				NO CHANGE			INCREASED		NO CHANGE		INCREASED		
(16)	DUE DATE OF NEXT ANNUAL RATE FILING / CERTIFICATION		1/1/2015		5/1/2014		11/1/2014		1/15/2014							

EXHIBIT B - ANALYSIS OF RECENT HOMEOWNERS RATE FILING INFORMATION - TOP 30 VOLUNTARY INSURERS*

(1) RANK	#23	#24	#25	#26	#27	#27	#27	#28
(2) COMPANY	AUTO CLUB INS CO OF FLORIDA	OLYMPUS	TOWER HIL SELECT	USAA CASUALTY	GULFSTREAM PROPERTY AND CASUALTY	GULFSTREAM PROPERTY AND CASUALTY	GULFSTREAM PROPERTY AND CASUALTY	AMERICAN STRATEGIC SEE NOTES
(3) OFFICE FILING NUMBER	ARC 13-19561	FCP 13-02147	FCP 12-16522	FCP 13-00675	FCP 12-16524	FCP 12-16524	FCP 13-13195	FCP 12-08308
(4) TYPE OF FILING**	ARC	LIM REIN	ARF	ARF	LIM REIN	LIM REIN	ARF	ARF
(5) DATE RECEIVED	11/07/13	02/05/13	10/05/12	01/11/13	10/05/12	10/05/12	07/24/13	05/11/12
(6) RATE COLLECTION SYSTEM								
(A) PROGRAM NAME	PACKAGE POLICY	OLYMPUS HOMEOWNERS	THSHO	USAA-CIC HOMEOWNERS	GSPHO	GSPHO	GSPHO	SEE NOTES
(B) EARNED HOUSE YEARS		53,399	55,405	SEE #9	31,354	38,757		SEE #15
(C) EARNED PREMIUMS AT CURRENT RATE LEVEL		\$106,915,029	\$118,454,183	UNITED	\$58,469,536	\$67,874,442		ASI
(D) 12 MONTHS ENDING DATE OF DATA		9/30/2012	12/31/2011	SERVICES	9/20/2011	9/30/2012		PREFERRED
(7) PROPOSED PERCENT CHANGE	0.0%	10.1%	13.4%					
(8) APPROVED PERCENT CHANGE ***	0.0%	9.3%	13.4%		3.3%	4.3%		
(9) INDICATION - COMPANY	12.6%	10.1%	33.5%		3.3%	0.0%		
(10) INDICATION - OFFICE ***	2.8%	9.3%	16.3%		3.3%	5.7%		
(11) NEW BUSINESS EFFECTIVE DATE	11/1/2013	4/16/2013	4/1/2013		1/1/2013	11/1/2013		
(12) RENEWAL BUSINESS EFFECTIVE DATE	11/1/2013	4/16/2013	4/1/2013		1/15/2013	11/1/2013		
(13) STATUS (AFP = APPROVED FINAL PAGES)	ACCEPTED	APPROVED	APPROVED		APPROVED	WITHDRAWN		
(14) REINSURANCE COST - WITH OFFICE ADJUSTMENT IF ANY						SEE NOTES		
(A) NON-FHCF REINS. COST	16.7%	23.0%	25.9%		20.1%	15.8%		
(B) FHCF REINS. COST	2.0%	1.4%	1.8%		1.7%	2.3%		
(C) TOTAL REINS. COST	18.7%	24.4%	27.7%		21.8%	18.1%		
(D) REDUCTION - IN PERCENTAGE POINTS	-2.4%					-3.7%		
(E) REDUCTION - AS A PERCENTAGE OF PREVIOUS COST	-11.4%					-17.0%		
(F) REINSURANCE CONTRACT YEAR	2013/2014	2012/2013	2012/2013		2012/2013	2013/2014		
(G) AFFILIATES	NO	YES	YES		YES	YES		
(15) HURRICANE MODEL								
(A) MODEL USED	AIR V 14.0.1	RMS 11.0 SP2	AIR V 12.0.1		RMS 11.0.SP2	RMS V 11.0.SP2C		
(B) IN-FORCE DATA DATE	06/30/13	09/30/12	12/31/11		06/30/12	06/30/13		
(C) CHG IN RETURN TIME FROM 2012/13 CONTRACT YEAR	DECREASED					INCREASED		
(16) DUE DATE OF NEXT ANNUAL RATE FILING / CERTIFICATION	11/1/2014	1/1/2014	4/1/2014			11/1/2014		

EXHIBIT B - ANALYSIS OF RECENT HOMEOWNERS RATE FILING INFORMATION - TOP 30 VOLUNTARY INSURERS*

(1) RANK	#28	#29	#30	#30	#30
(2) COMPANY	AMERICAN STRATEGIC SEE NOTES FCP 13-13768 LIM REIN 08/02/13	AMERICAN MODERN INS CO OF FLORIDA INC FCP 11-01901 ARF 02/09/11	FLORIDA FARM BUREAU CASUALTY SEE NOTES FCP 12-02959 ARF 02/27/12	FLORIDA FARM BUREAU CASUALTY SEE NOTES FCP 13-08492 ARF 04/30/13	FLORIDA FARM BUREAU CASUALTY SEE NOTES FCP 13-20980 ARF 11/25/13
(3) OFFICE FILING NUMBER					
(4) TYPE OF FILING**					
(5) DATE RECEIVED					
(6) RATE COLLECTION SYSTEM					
(A) PROGRAM NAME	SEE NOTES	RENTERS POLICY	SEE NOTES	SEE NOTES	SEE NOTES
(B) EARNED HOUSE YEARS	SEE #15	15,280	76,550	74,901	73,849
(C) EARNED PREMIUMS AT CURRENT RATE LEVEL	ASI	\$2,790,626	\$122,879,312	\$138,050,382	\$135,875,137
(D) 12 MONTHS ENDING DATE OF DATA	PREFERRED	12/30/2009	3/31/2011	9/30/2012	3/31/2013
(7) PROPOSED PERCENT CHANGE			14.7%	0.5%	0.8%
(8) APPROVED PERCENT CHANGE ***			14.1%	0.0%	
(9) INDICATION - COMPANY			21.3%	0.5%	0.8%
(10) INDICATION - OFFICE ***			14.1%	-3.7%	
(11) NEW BUSINESS EFFECTIVE DATE		7/1/2011	10/1/2012	10/1/2013	5/1/2014
(12) RENEWAL BUSINESS EFFECTIVE DATE		8/1/2011	10/1/2012	10/1/2013	5/1/2014
(13) STATUS (AFP = APPROVED FINAL PAGES)		APPROVED	APPROVED	WITHDRAWN	PENDING
(14) REINSURANCE COST - WITH OFFICE ADJUSTMENT IF ANY					
(A) NON-FHCF REINS. COST		4.2%	25.1%	23.4%	24.6%
(B) FHCF REINS. COST		0.5%	0.8%	1.4%	1.5%
(C) TOTAL REINS. COST		4.7%	25.9%	24.8%	26.1%
(D) REDUCTION - IN PERCENTAGE POINTS				-1.1%	0.2%
(E) REDUCTION - AS A PERCENTAGE OF PREVIOUS COST		2010	2011/2012	2013/2014	2013/2014
(F) REINSURANCE CONTRACT YEAR		NO	NO	NO	NO
(G) AFFILIATES					
(15) HURRICANE MODEL					
(A) MODEL USED		AIR v. 11.0	AIR v. 12.0.1	AIR v. 12.0.1	AIR v. 14.0.1
(B) IN-FORCE DATA DATE		12/31/09	06/30/11	06/30/12	06/30/13
(C) CHG IN RETURN TIME FROM 2012/13 CONTRACT YEAR				INCREASED	INCREASED
(16) DUE DATE OF NEXT ANNUAL RATE FILING / CERTIFICATION		7/1/2012			5/1/2015

EXHIBIT C - NOTES FOR ANALYSIS - TOP 30 VOLUNTARY INSURERS*

NOTES	
*	TOP 30 INSURERS EXCLUDING CITIZENS - BASED ON QUASRng DATA AS OF 09/30/2013
**	ANNUAL RATE FILING = ARF, ANNUAL RATE CERTIFICATION = CERT, LIMITED REINSURANCE FILING = LIM REIN
***	THE INDICATIONS SHOWN ARE FOR ALL HOMEOWNERS POLICY TYPES (OWNERS, RENTERS, CONDO). DUE TO DIFFERENCES IN INDICATIONS BY POLICY TYPE AND THE INSURER SELECTIONS, THERE MAY BE VARIATIONS BETWEEN THE OFFICE INDICATIONS AND FINAL APPROVED CHANGES.
#5	UNITED SERVICES AUTO. ASSOC. INCLUDES USAA CASUALTY AND USAA GENERAL INDEMNITY INCLUDES USAA-CIC HOMEOWNERS AND USAA-GIC HOMEOWNERS PROGRAMS FHCF REINS. COST = 0.0% BECAUSE USAA RECOUPTS FHCF PREMIUM
#10	CASTLE KEY INDEMNITY FOR FCP 13-13816, THE COMPANY INDICATIONS ARE BASED ON 2012/2013 REINSURANCE COSTS. THE CURRENT OFFICE INDICATIONS ARE ALSO BASED ON 2012/2013 REINSURANCE COSTS. THE COMPANY WILL PROVIDE 2013/2014 REINSURANCE COST
#12	CASTLE KEY FOR FCP 13-13811, THE COMPANY INDICATIONS ARE BASED ON 2012/2013 REINSURANCE COSTS. THE CURRENT OFFICE INDICATIONS ARE ALSO BASED ON 2012/2013 REINSURANCE COSTS. THE COMPANY WILL PROVIDE 2013/2014 REINSURANCE COST
#13	FEDERATED NATIONAL DOES NOT INCLUDE THE "FEDERATED HOMEOWNERS ASSUMPTION PROGRAM"
#14	ASI PREFERRED INCLUDES ASI PREFERRED, ASI ASSURANCE, AMERICAN STRATEGIC INCLUDES ASI PREFERRED HO PROGRAM, HO4 - TENANTS PROGRAM, HOMEOWNERS, AND NATIONAL HOMEOWNERS PROGRAMS
#15	AMERICAN INTEGRITY INS CO OF FLORIDA DOES NOT INCLUDE THE "AIIIC ASSUMED HOMEOWNERS" PROGRAM
#18	PEOPLE'S TRUST INCLUDES PTIC HOMEOWNERS - GRANITE, PTIC HOMEOWNERS - GRANITE - AGENT, PTIC HOMEOWNERS - MARBLE, AND PTIC HOMEOWNERS - MARBLE - AGENT
#21	CYPRESS PROPERTY AND CASUALTY FOR FCP 13-13833, THE COMPANY INDICATIONS ARE BASED ON 2012/2013 REINSURANCE COSTS. THE OFFICE INDICATIONS ARE BASED ON THE 2013/2014 REINSURANCE COSTS REQUESTED DURING OUR REVIEW OF THE FILING. THE NON-FHCF REINSURANCE COST FOR 2013/2014 WAS 15.5% COMPARED TO THE 2012/2013 REINSURANCE COST OF 22.7%. THE COMPANY DID NOT AGREE TO THE OFFICE REQUEST THAT RATES BE REDUCED BY -3.1%. A NOTICE OF INTENT WAS ISSUED ON OCTOBER 31, 2013. THE COMPANY WITHDREW THE FILING ON NOVEMBER 21, 2013.
#23	AUTO CLUB INS CO OF FLORIDA ARC 13-19561 IS AN ANNUAL RATE CERTIFICATION. THE OFFICE REQUESTED RATE INDICATIONS AND SUPPORT WHICH WAS PROVIDED BY THE COMPANY
#27	GULFSTREAM PROPERTY AND CASUALTY DOES NOT INCLUDE THE "HOMEOWNERS PROGRAM" FOR FCP 13-13195, THE COMPANY INDICATIONS ARE BASED ON 2012/2013 REINSURANCE COSTS. THE OFFICE INDICATIONS ARE BASED ON THE 2013/2014 REINSURANCE COSTS REQUESTED DURING OUR REVIEW OF THE FILING. THE NON-FHCF REINSURANCE COST FOR 2013/2014 WAS 15.8% COMPARED TO THE 2012/2013 REINSURANCE COST OF 19.4%. THE OFFICE REQUESTED THAT THE OVERALL CHANGE BE REDUCED TO 0.0%. THE COMPANY CHOSE TO WITHDRAW THE FILING.
#30	FLORIDA FARM BUREAU CASUALTY INCLUDES FLORIDA FARM BUREAU GENERAL INCLUDES HO PREFERRED (CASUALTY) AND HO STANDARD (GENERAL)