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Via Email and Hand Delivery

J'ne Byckovski, FCAS, MAAA
PCActuarial@tdi.texas.gov
Chief Actuary, Property and Casualty
Texas Department of Insurance
333 Guadalupe Street, MC 105-5F
Austin, TX 78701

**Re: TAIPA Personal & Commercial Auto Rate Filing
TDI Link #s S645773 and S645774**

Dear Ms. Byckovski:

OPIC has received and reviewed the September 8, 2017 TAIPA rate filing for personal and commercial auto. We do not object to the rates as proposed, but we do have two concerns we need to present.

First, we are unclear why it appears to consider a one-year paid pure premium charge for personal auto. This was never proposed as a consideration when it was agreed to index TAIPA rates to the three-year change in voluntary private passenger auto loss costs.

Second, we are troubled by language in the actuarial memorandum that implies TAIPA may use actuarial judgment carte blanche to make rates going forward. OPIC never agreed to that and does not agree with that. While OPIC does not object to the rates as proposed, we do take issue with the elements of the filing that imply changes to the agreed ratemaking methodology can be made based on the judgment of TAIPA's actuary.

Sincerely,



Joe Matetich
Deputy Public Counsel

cc: Chief Clerk, TDI (ChiefClerk@tdi.texas.gov)