



# Office of Public Insurance Counsel

**Joe Matetich**  
**Deputy Public Counsel**

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August 8, 2017

*Via Hand Delivery*

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

**Re: Hallmark County Mutual Insurance Co.  
Personal Auto Rate Filing  
TDI Link # S642293**

Dear Ms. Byckovski:

Pursuant to TEX. INS. CODE ANN. Section 2251.106, the Office of Public Insurance Counsel (OPIC) objects to this personal auto rate filing because it produces rates that do not comply with rating standards set forth in TEX. INS. CODE ANN. Sections 2251.051, 2251.052, and 560.002.

### **Objection – Installment Fees**

Hallmark County Mutual is filing to increase its installment payment fee 86% from \$7 to \$13 per transaction. We consider this fee exorbitant and no support has been provided to justify this increase. Based on the complete lack of support, we believe the company's prior installment fee to be more than sufficient to cover costs associated with billing policyholders.

Sincerely,

Joe Matetich  
Deputy Public Counsel

cc: Mike Dundas, Product Manager  
Hallmark County Mutual Insurance Co.  
6500 Pinecrest Dr, Suite 100  
Plano, TX 75025  
VIA EMAIL: [mdundas@hallmarkinsco.com](mailto:mdundas@hallmarkinsco.com)

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