

Governor Eric R. Greitens
State of Missouri



Department of Insurance
Financial Institutions
and Professional Registration
Chlora Lindley-Myers, Director

DIVISION OF INSURANCE MARKET REGULATION

April 16, 2018

Kara Baysinger
Dentons US LLP
One Market Plaza
Spear Tower, 24th Floor
San Francisco, CA 94105

RE: *Modification to the RSA dated January 24, 2018*

Dear Ms. Baysinger:

Pursuant to Section D (18) of the Regulatory Settlement Agreement (RSA) dated January 24, 2018 between National Union Fire Insurance Company of Pittsburgh PA (NUFIC) and the Signatory Lead States of Missouri, Minnesota, Ohio, Oklahoma, Pennsylvania and Utah, the Signatory Lead States will notify the Companies of any Agreements or terms of Agreements that they enter into with any other Travel Insurance Companies that is inconsistent with the Business Reforms adopted in the RSA. Upon receipt of such notice, NUFIC may seek a modification to the RSA relating to the Business Reform at issue from the Signatory Lead States, and the Signatory Lead States will not unreasonably withhold consent to such a request for modification.

On April 10, 2018, the Signatory Lead States notified NUFIC that agreements with other travel insurers contained a term that is inconsistent with Section C (29) of the NUFIC RSA. NUFIC responded by seeking a modification of Section C (29) of the RSA to conform to similar provisions contained in RSA's with other travel insurers.

The Signatory Lead States and National Union Fire Insurance Company of Pittsburgh PA hereby agree to modify the terms of Section C (29) of the RSA dated January 24, 2018 between NUFIC and the Signatory Lead States to read as follows:

"Company agrees that it will adopt and implement in each of the Participating States, except Pennsylvania, all Forward Looking Guidelines for Rate Filings contained in the Merlinos & Associates Report for National Union Fire Insurance Company of Pittsburgh PA dated September 7, 2017, which is part of the confidential examination workpapers for Investigation Number 234507, to the extent that such Forward Looking Guidelines are required by the Participating State in a filing and are consistent with the Insurance Laws in the applicable Participating State, and with the understanding that this requirement to follow the guidelines is subject to each Participating State's enforcement of the RSA and that a Participating State can choose not to require the Company to follow these guidelines"



Stewart Freilich
Senior Regulatory Affairs Counsel
Missouri Department of Insurance,
Financial Institutions and
Professional Registration

On behalf of the Signatory Lead States



[Print Name and Title]

Steve R. Hartz
Vice President

On behalf of National Union Fire
Insurance Company of Pittsburgh PA