

**To: RATE AND FORM FILING DEPARTMENT**

**Property and Casualty Insurance Companies  
Title Insurance Companies  
Rating Organizations**

**Re: Revised Procedures for the Calculation of Filing Fees for Form Filings**

**Date: February 25, 2000**

**Bulletin: Property and Casualty – 00 - 06**

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The Rates and Forms Unit of the Property and Casualty Section recently issued a bulletin (Property and Casualty – 99 - 22) addressing the correct method for calculating the amount of the filing fee required for form(s) filings. While the bulletin accurately interprets relevant Maryland law, the Maryland Insurance Administration (MIA) has learned that strict enforcement of that bulletin may have the unintended consequence of discouraging the filing of new programs or policies.

Therefore, Commissioner Larsen has determined that the MIA's enforcement of Bulletin 99 - 22 will be modified as follows:

Filing fees for forms must continue to be calculated at the rate of \$125 per insurer per individual form per filing. However, the following revised form filing procedures will be applicable to form filings received by the MIA on or after April 3, 2000:

- a. No insurer will be required to submit more than \$1,000 for any filing of policy forms – regardless of the number of individual forms contained within the filing.
- b. If multiple insurers within an insurer group submit identical forms, only a single filing fee will be collected and the \$1,000 cap will apply. Identical forms are defined as forms submitted by one insurer that are identical in every way to the forms submitted by the other insurers within the insurer group. The only exception is that each insurer within an insurer group will be permitted to include that insurer's name, trademark, servicemark or logo and a unique form number on its respective forms.

**Property and Casualty Insurance Companies**  
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In order to qualify for this exemption, the filer must include a separate signed certification (see attached) with each filing stating that the forms filed by each insurer within the insurer group are identical. The MIA, in reliance upon that certification, will only review the forms submitted by the insurer submitting the filing fee and not each individual insurer as it has previously done. If the MIA later determines that the certification was made in error, additional filing fees will be collected and penalties may be applied, where appropriate.

Please communicate these revised guidelines for the calculation of filing fees for form filings to all company personnel who are responsible for submitting filings to the Property and Casualty Section of the Maryland Insurance Administration.

If you have any questions about the revised procedures, contact **Dave Diehl**, Chief Administrator, by telephone at (410) 468-2320 or by Email at [ddiehl@mia.state.md.us](mailto:ddiehl@mia.state.md.us)

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Robert Becker  
Associate Commissioner  
Property and Casualty

**Attachment**

**Certificate  
for the  
Certification of Forms**

On behalf of the following insurance companies, I am requesting an exemption from the duplication of filing fees applicable to multiple insurers within an insurer group.

**Name of Insurer Group**

(Group name)

**Name of Insurer Submitting the Filing Fee**

(Insurance Company)

**Name(s) of Insurer(s) Requesting an Exemption from the Filing Fee(s)**

(Insurance Company)

(Insurance Company)

(Insurance Company)

(Insurance Company)

I certify that the each of these insurers are members of the above insurer group, and are therefore eligible for an exemption from duplicate filing fees. The forms being submitted by these insurers are identical in every way. The only exception to this certification is that each insurer within the insurer group is permitted to include that insurer's specific name, trademark, servicemark or logo and a unique number on its respective forms.

_____ Name	_____ Title	_____ Date
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**WARNING**

The MIA, in reliance upon this certification, will only review the forms submitted by the insurer submitting the filing fee. If the MIA later determines that the above certification was made in error, additional filing fees will be collected and penalties may apply.