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**CONSUMER CREDIT INSURANCE ASSOCIATION**

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WILLIAM F. BURFEIND  
EXECUTIVE VICE PRESIDENT

July 16, 2004

sent facsimile 512.322.3552

Ana M. Smith-Daley  
Deputy Commissioner  
Texas Department of Insurance  
Life/Health Division, Mail Code 106-1A  
333 Guadalupe Street  
P.O. Box 149104  
Austin, TX 78714-9104

**RECEIVED**  
JUL 20 2004  
Filings Intake Section  
Texas Department of Insurance

Re: Credit Insurance Presumptive Premium Rate Recommendation

Dear Ms Smith-Daley:

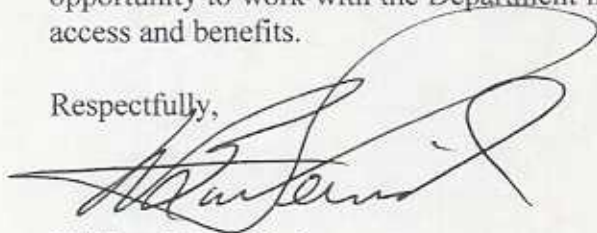
Enclosed is a presumptive rate recommendation submitted in accordance with the Texas Department of Insurance website notice and oral representation of the filing date extension to July 16. The data analysis and presumptive rate recommendation was done by Christopher Hause of Hause Actuarial Solutions at the request of Consumer Credit Insurance Association (CCIA) and the Texas Association of Life and Health Insurers (TALHI). CCIA and TALHI encourage the Department to revise presumptive credit insurance premium rates consistent with this recommendation.

CCIA is a national trade association of companies selling or servicing consumer debt protection products including credit life and credit accident & health insurance. Many of our member companies are doing business in Texas. TALHI is an association of Texas life and health insurance companies, many of which are engaged in the credit insurance business in Texas. Some of these companies are members of both associations. Thus, we have a common interest in this matter.

The Hause analysis and recommendation was subjected to peer review by the CCIA Actuarial Committee. This peer review concluded that the report assumptions and methodology conform to professional standards of practice and principles.

CCIA and TALHI are very much aware that the report recommends a significant increase in the presumptive premium rates. Clearly, the data, assumptions, or methodology underlying the current presumptive premium rates needs to be corrected or updated. CCIA and TALHI would welcome the opportunity to work with the Department in developing presumptive premium rates that expand consumer access and benefits.

Respectfully,



William F. Burfeind  
Executive Vice President