



# TEXAS ASSOCIATION OF LIFE & HEALTH INSURERS

Thomas A. Munson  
Chairman  
Landmark Life  
Insurance Company

Ronald Taylor  
Vice Chairman  
BlueCross BlueShield  
of Texas

Raymond J. Martin, Jr.  
Secretary  
National Teachers Associates  
Insurance Company

Jerry D. Davis  
Treasurer  
National Farm Life  
Insurance Company

R. Michael Pollard  
Executive Director

June 18, 2004

Copy to Jan ✓  
Jackie  
John  
Kim  
Qu  
6/18/04

Ms. Ana M. Smith-Daley  
Deputy Commissioner  
Texas Department of Insurance  
333 Guadalupe P.O. Box 149104  
Austin, Texas 78714-9104

I agree to the  
extension in light of  
the circumstances,

**HAND DELIVER** Will call Mike  
to agree on the  
extension period.  
(30 days from what ?? 6/18 ??)

RE: Notice Relating to Presumptive Premium Rates

Dear Ms. Smith-Daley:

The Texas Association of life & Health Insurers ("TALHI") is a Texas trade organization that represents approximately 175 life and health insurers that do business in Texas. Many of our member companies are interested in and affected by the above referenced notice and the prospective rule proposal relating the presumptive premium rates for credit life and credit accident & health insurance.

Consequently, TALHI desires to submit rate recommendations and supporting evidence pursuant to your request. However, the notice requires that rate recommendations must be submitted no later than 5:00 p. m., June 28, 2004. TALHI respectfully requests that an additional time of at least thirty days be allowed for submitting this information. We have downloaded and began an initial review of the Experience and Expense Summary data for the periods 2000, 2001 and 2002. This data is voluminous and extensive. To properly review and analyze this information and prepare a comprehensive and complete report will take substantially longer than the deadline required in the Notice. I would also note that although the Notice is dated June 1, 2004, TALHI received the Notice by regular mail on June 14, 2004, with the Notice having a mailing postmark of June 9, 2004.

We believe that the Department should desire to have all creditable recommendations from parties affected by this Notice. Therefore, it would seem appropriate to allow these parties, including TALHI, to have sufficient time to review, analyze and report our findings thoroughly and accurately.

We very much appreciate your consideration of this time extension request. Thank you very much.

Very truly yours,

R. Michael Pollard  
Executive Director

RMP/pjb