

State: District of Columbia **Filing Company:** The Guardian Life Insurance Company of America
TOI/Sub-TOI: H20G Group Health - Vision/H20G.000 Health - Vision
Product Name: 11/1/2012 Washington, DC Vision Filing
Project Name/Number: /

Filing at a Glance

Company: The Guardian Life Insurance Company of America
Product Name: 11/1/2012 Washington, DC Vision Filing
State: District of Columbia
TOI: H20G Group Health - Vision
Sub-TOI: H20G.000 Health - Vision
Filing Type: Rate
Date Submitted: 07/17/2012
SERFF Tr Num: GARD-128579196
SERFF Status: Assigned
State Tr Num:
State Status:
Co Tr Num:

Implementation: On Approval
Date Requested:
Author(s): Alison Serewko, Rimma Kosubevsky
Reviewer(s): Efren Tanhehco (primary), Carolyn King
Disposition Date:
Disposition Status:
Implementation Date:

State Filing Description:

State: District of Columbia Filing Company: The Guardian Life Insurance Company of America
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General Information

Project Name: Status of Filing in Domicile: Pending
 Project Number: Date Approved in Domicile:
 Requested Filing Mode: Review & Approval Domicile Status Comments:
 Explanation for Combination/Other: Market Type: Group
 Submission Type: New Submission Group Market Size: Small and Large
 Group Market Type: Employer Overall Rate Impact: 1.25%
 Filing Status Changed: 07/20/2012
 State Status Changed: Deemer Date:
 Created By: Alison Serewko Submitted By: Alison Serewko
 Corresponding Filing Tracking Number:

Filing Description:

Below is a summary of the proposed Vision rate manual change(s) to be effective on November 1, 2012.

- 1.20% increase to VSP rates.
- 1.88% increase to Davis Vision rates.

See the Actuarial Memorandum for more detail.

Company and Contact

Filing Contact Information

Alison Serewko, alison_serewko@glic.com
 7 Hanover Square 212-598-7884 [Phone]
 Mail Station 22-C 212-919-2460 [FAX]
 New York, NY 10004

Filing Company Information

The Guardian Life Insurance CoCode: 64246 State of Domicile: New York
 Company of America Group Code: 429 Company Type: Life
 7 Hanover Square Group Name: State ID Number:
 New York, NY 10004 FEIN Number: 13-5123390
 (212) 598-8704 ext. [Phone]

Filing Fees

Fee Required? No
 Retaliatory? No
 Fee Explanation:
 Per Company: No

Company	Amount	Date Processed	Transaction #
The Guardian Life Insurance Company of America	\$0.00		

SERFF Tracking #:

GARD-128579196

State Tracking #:**Company Tracking #:****State:**

District of Columbia

Filing Company:

The Guardian Life Insurance Company of America

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Rate Information

Rate data applies to filing.

Filing Method:

SERFF

Rate Change Type:

Increase

Overall Percentage of Last Rate Revision:

-2.700%

Effective Date of Last Rate Revision:

10/01/2011

Filing Method of Last Filing:

SERFF

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
The Guardian Life Insurance Company of America	1.250%	1.250%	\$13,085	80	\$1,046,811	4.400%	0.400%

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Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action*	Rate Action Information		Attachments
					Previous State Filing Number:	February 2010	
1		VC-28-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number:	February 2010	VC-28-DC (November 2012).pdf
					Percent Rate Change Request:		
2		VC-29-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number:	March 2010 (Revised)	VC-29-DC (November 2012).pdf
					Percent Rate Change Request:		
3		VC-31-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number:	October 2011	VC-31-DC (November 2012).pdf
					Percent Rate Change Request:		
4		LTT-VC-7-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number:	March 2010	LTT-VC-7-DC (November 2012).pdf
					Percent Rate Change Request:		
5		LTT-VC-7.1-DC	GP-1-VSN-96-VIS, GP-1-DAVIS-05-VIS	Revised	Previous State Filing Number:	March 2011	LTT-VC-7.1-DC (November 2012).pdf
					Percent Rate Change Request:		

THE GUARDIAN Life Insurance Company of America

Line 2 - VSP CHOICE DISCOUNT

<u>Factor</u>		<u>Factor</u>		<u>Factor</u>	
AK	0.880	KY	0.834	NY	0.868
AL	0.825	LA	0.860	OH	0.825
AR	0.862	MA	0.828	OK	0.866
AZ	0.936	MD	0.894	OR	0.826
CA	0.827	ME	0.853	PA	0.933
CO	0.847	MI	0.834	RI	0.876
CT	0.844	MN	0.815	SC	0.819
DC	0.877	MO	0.829	SD	0.838
DE	0.932	MS	0.851	TN	0.827
FL	0.917	MT	0.844	TX	0.858
GA	0.813	NC	0.826	UT	0.838
HI	0.861	ND	0.843	VA	0.866
IA	0.844	NE	0.840	VT	0.846
ID	0.830	NH	0.824	WA	0.834
IL	0.903	NJ	0.880	WI	0.855
IN	0.844	NM	0.847	WV	0.840
KS	0.837	NV	0.843	WY	0.852

THE GUARDIAN Life Insurance Company of America

Line 3 - BENEFIT VARIATIONS FACTOR

A. VSP

	<u>Enhanced B</u>	<u>All Other Plans</u>
Retail Frame Allowance 120	1.051	1.000
Retail Frame Allowance 125	1.068	1.016
Retail Frame Allowance 130	1.084	1.032
Retail Frame Allowance 135	1.099	1.046
Retail Frame Allowance 140	1.113	1.060
Retail Frame Allowance 145	1.127	1.073
Retail Frame Allowance 150	1.139	1.084
Contact Lens Allowance 120	1.015	1.000
Contact Lens Allowance 125	1.024	1.009
Contact Lens Allowance 130	1.033	1.018
Contact Lens Allowance 135	1.042	1.027
Contact Lens Allowance 140	1.052	1.036
Contact Lens Allowance 145	1.061	1.045
Contact Lens Allowance 150	1.070	1.054
	<u>VSP</u>	<u>Davis</u>
Primary Eye Care Benefit	1.004	1.004
Anti-Reflective Coating	1.200	1.200
Progressive Multifocals	1.200	1.200
Polycarbonate lenses for adults	1.140	1.140
Tints	1.125	1.125
Second Pair Benefit	1.430	1.430
Covered Contacts Benefit	1.420	1.420
Safety Eyecare Program	1.300	1.300
UV	1.005	1.005
Scratch Resistant Coating	1.010	1.010
Blended	1.001	1.001
High Index	1.055	1.055
Mirror/Ski Coating	1.001	1.001
Oversized	1.001	1.001
Polarized/Laminated	1.020	1.020
Edge Treatment	1.010	1.010
Diabetic Eyecare	1.001	1.001
Elective Contact Lens (ECL) Fittings and Evaluation	1.014	1.014
Package A discount	0.960	0.960
Interim Benefit Option A	1.100	1.100
Interim Benefit Option B	1.075	1.075

B. DAVIS

	<u>Davis Designer</u>	<u>Premier Platinum</u>
Retail Frame Allowance 120	1.000	N/A
Retail Frame Allowance 130	1.024	N/A
Retail Frame Allowance 135	1.035	1.000
Retail Frame Allowance 150	1.070	1.035
Contact Lens Allowance 120	1.000	N/A
Contact Lens Allowance 130	1.007	N/A
Contact Lens Allowance 135	1.010	1.000
Contact Lens Allowance 150	1.020	1.010

THE GUARDIAN Life Insurance Company of America

Line 6 - PRIOR COVERAGE FACTORS

	FACTOR	
<u>Prior Coverage</u>	<u>VSP</u>	<u>DAVIS</u>
No	1.000	1.000
Yes, with Davis	0.980	.95
Yes, with VSP	0.950	.98
Yes, with other (non VSP, non Davis)	0.980	.98

Multiply the rate by this factor.

Line 7 - SECULAR TREND FACTOR

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>
8/1/12 - 9/30/12	1.0907	0.9908	0.9908

VSP - Increase factor by 0.01 for each succeeding three month period
Davis - Increase factor by 0.00813 for each succeeding three month period

Line 7a - EXAM PLUS ALLOWANCE TREND

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>
8/1/12 - 9/30/12	1.0907	0.9908	0.9908

VSP - Increase factor by 0.01 for each succeeding three month period
Davis - Increase factor by 0.00813 for each succeeding three month period

Line 7b - MATERIALS ONLY TREND

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>
8/1/12 - 9/30/12	N/A	0.9908	0.9908

Increase factor by 0.00813 for each succeeding three month period

Line 7c - EXAM PLUS TREND

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>
8/1/12 - 9/30/12	1.0907	0.9908	0.9908

VSP - Increase factor by 0.01 for each succeeding three month period
Davis - Increase factor by 0.00813 for each succeeding three month period

THE GUARDIAN Life Insurance Company of America

Line 2 - VSP CHOICE DISCOUNT

Factor		Factor		Factor	
AK	0.880	KY	0.834	NY	0.868
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CA	0.827	ME	0.853	PA	0.933
CO	0.847	MI	0.834	RI	0.876
CT	0.844	MN	0.815	SC	0.819
DC	0.877	MO	0.829	SD	0.838
DE	0.932	MS	0.851	TN	0.827
FL	0.917	MT	0.844	TX	0.858
GA	0.813	NC	0.826	UT	0.838
HI	0.861	ND	0.843	VA	0.866
IA	0.844	NE	0.840	VT	0.846
ID	0.830	NH	0.824	WA	0.834
IL	0.903	NJ	0.880	WI	0.855
IN	0.844	NM	0.847	WV	0.840
KS	0.837	NV	0.843	WY	0.852

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A. VSP

	Enhanced B	All Other Plans
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Contact Lens Allowance 135	1.042	1.027
Contact Lens Allowance 140	1.052	1.036
Contact Lens Allowance 145	1.061	1.045
Contact Lens Allowance 150	1.070	1.054
	VSP	Davis
Primary Eye Care Benefit	1.004	1.004
Anti-Reflective Coating	1.200	1.200
Progressive Multifocals	1.200	1.200
Polycarbonate lenses for adults	1.140	1.140
Tints	1.125	1.125
Second Pair Benefit	1.430	1.430
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Safety Eyecare Program	1.300	1.300
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Blended	1.001	1.001
High Index	1.055	1.055
Mirror/Ski Coating	1.001	1.001
Oversized	1.001	1.001
Polarized/Laminated	1.020	1.020
Edge Streatment	1.010	1.010
Package A discount	0.960	0.960
Interim Benefit Option A	1.100	1.100
Interim Benefit Option B	1.075	1.075

B. DAVIS

	Davis Designer	Premier Platinum
Retail Frame Allowance 120	1.000	N/A
Retail Frame Allowance 130	1.024	N/A
Retail Frame Allowance 135	1.035	1.000
Retail Frame Allowance 150	1.700	1.035
Contact Lens Allowance 120	1.000	N/A
Contact Lens Allowance 130	1.007	N/A
Contact Lens Allowance 135	1.010	1.000
Contact Lens Allowance 150	1.020	1.010

THE GUARDIAN Life Insurance Company of America

Line 5 - RATE GUARANTEE PERIOD

I. Rate Guarantee

<u>Guarantee in Years</u>	<u>Factor</u>
1	1.000
2	1.025*

Multiply the rate by this factor.

*Not available in Florida

II. Renewal Caps

<u>Renewal Cap Percent Option</u>	<u>First Renewal Cap</u>	<u>First and Second Renewal Cap</u>
5.0%	1.010	1.020
5.5%	1.010	1.020
6.0%	1.010	1.020
6.5%	1.010	1.020
7.0%	1.005	1.010
7.5%	1.005	1.010
8.0%	1.005	1.010
8.5%	1.005	1.010
9.0%	1.005	1.010
9.5%	1.005	1.010
10.0%	1.000	1.000
10.5%	1.000	1.000
11.0%	1.000	1.000
11.5%	1.000	1.000
12.0%	1.000	1.000
12.5%	1.000	1.000
13.0%	1.000	1.000
13.5%	1.000	1.000
14.0%	1.000	1.000
14.5%	1.000	1.000
15.0%	1.000	1.000

Line 7 - SECULAR TREND FACTOR

A. VSP

<u>Effective Date</u>	<u>VSP</u>
8/1/12 - 9/30/12	1.0061*

*Increase factor by 0.01 for each succeeding three month period.

B. DAVIS

<u>Effective Date</u>	<u>Davis Designer</u>	<u>Davis Premier Platinum</u>
8/1/12 - 9/30/12	1.1181	1.1181

Increase factor by 0.00813 for each succeeding three month period.

Line 7a - EXAM PLUS ALLOWANCE TREND

<u>Effective Date</u>	<u>VSP</u>	<u>Davis Designer</u>	<u>Davis Premier Platinum</u>
8/1/12 - 9/30/12	1.0061	1.1181	1.1181

VSP - Increase factor by 0.01 for each succeeding three month period.
 Davis - Increase factor by 0.00813 for each succeeding three month period.

Line 7b - MATERIALS ONLY TREND

<u>Effective Date</u>	<u>VSP</u>	<u>Davis Designer</u>	<u>Davis Premier Platinum</u>
8/1/12 - 9/30/12	N/A	1.1181	1.1181

Increase factor by 0.00813 for each succeeding three month period.

Line 7c - EXAM PLUS TREND

<u>Effective Date</u>	<u>VSP</u>	<u>Davis Designer</u>	<u>Davis Premier Platinum</u>
8/1/12 - 9/30/12	1.0061	1.1181	1.1181

VSP - Increase factor by 0.01 for each succeeding three month period.
 Davis - Increase factor by 0.00813 for each succeeding three month period.

SERFF Tracking #:

GARD-128579196

State Tracking #:

Company Tracking #:

State: District of Columbia

Filing Company:

The Guardian Life Insurance Company of America

TOI/Sub-TOI: H20G Group Health - Vision/H20G.000 Health - Vision

Product Name: 11/1/2012 Washington, DC Vision Filing

Project Name/Number: /

Supporting Document Schedules

		Item Status:	Status Date:
Satisfied - Item:	Actuarial Justification		
Comments:			
Attachment(s):			
Cover - Vision 201211 - DC.pdf			
ACTMEMO - Vision 201211 - DC.pdf			
ACTCERT - Vision 201211 - DC.pdf			

		Item Status:	Status Date:
Satisfied - Item:	Experience		
Comments:			
Attachment(s):			
Experience - Vision 201211 - DC.pdf			



July 17, 2012

Mr. Laszlo Pentek
Actuary
Government of the District of Columbia
Department of Insurance, Securities and Banking
810 First Street, NE, #701
Washington, DC, 20002

Re: Group Vision Rate Filing

Carrier: The Guardian Life Insurance Company of America
NAIC Company Code: 64246

Dear Mr. Pentek:

Enclosed are the latest changes to Guardian's Group Vision rate manual with rate changes for 11/1/2012 or later upon approval of this filing. The requested changes result in a 1.25% increase to our aggregate rate level, relative to our current rates.

This filing only includes those items that have changed since our last approved Vision rate filing. The SERFF number of our last approved Vision filing is GARD-127668469.

As of 3/31/2012, The Guardian provides vision insurance for 80 groups located in the District of Columbia, with a total of 7,841 lives.

Sincerely,

David Ferrari, FSA, MAAA
Assistant Actuary
Group Products
3900 Burgess Place, Mail Station 2E
Bethlehem, PA 18017
610.807.8026

7/17/2012

Date



ACTUARIAL MEMORANDUM

A. Description of Benefits

The Guardian has one class of business. In addition to benefit plan design, Guardian's Group Vision rates are adjusted based on industry, family composition, geographical area, and group size (lives and premium). There is no limit to the issue age range. The rating area is based on the state of the employer and the industry factors are based on the SIC code of the employer. We currently utilize a four-tier rate structure (Employee; Employee and Spouse; Employee and Child(ren); Employee, Spouse and Child(ren)).

Currently, Guardian's Group Vision rate manual can be used to calculate rates for a wide variety of Vision benefit plan designs for groups of 2 or more employees. Plan design options include varying levels of coverage for service and materials, with the choice of split or single copays. Our complete rate manual has been attached, along with a sample rate calculation.

B. Renewability Provision

Each case's rates are reviewed for renewal action on an annual basis. Renewal rate cap and 2-year rate guarantee options are also available.

C. Applicability (Closed/Open Block)

Guardian's Vision business is an open block.

D. Marketing Method

Guardian's Vision business is marketed through both our field force of agents and general agents as well as by brokers.

E. Underwriting Method

Underwriting is at the group level. Group characteristics and prior experience determine the level of underwriting. The plan holder's rates may be modified by underwriting review.

F. Issue Age Limits

There is no limit to the issue age range, and the premiums are determined on an attained age basis, since they change each year as the case renews.

G. Premium Basis

Rates are developed separately for "employee" and "dependent" categories. These categories are then split into "tier" rates based on factors that were developed using internal company data.



H. Nature of Rate Change and Proposed Rate/Methodology Change

Below is a summary of the proposed Vision rate manual change(s) to be effective on November 1, 2012 or later upon approval:

For Plans Utilizing the VSP Network:

1. Rates for VSP Choice plans are being increased by 4% due to adverse experience. This will have an impact of +0.3% to overall VSP rates.
2. We have increased the load for each of the following VSP lens options by 10% due to adverse experience: Anti-Reflective Coating, Progressive Multifocals, Polycarbonate lenses and Tints. These changes will have an impact of 0.5% to overall VSP rates.
3. We have reset our manual's VSP 10+ Secular Trend Factor to be effective from 8/1/2012 to 9/30/2012. Based on internal company experience, we have set the 10+ Secular Trend factor to 1.0907 (vs. 1.0864 last quarter), an increase of 0.4%. This factor will increase by 1% per quarter starting 10/1/2012.
4. We have reset our manual's VSP <10 Secular Trend Factor to be effective from 8/1/2012 to 9/30/2012. Based on internal company experience, we have set the <10 Secular Trend factor to 1.0061 (vs. 1.0021 last quarter), an increase of 0.4%. This factor will increase by 1% per quarter starting 10/1/2012.

The combined effect of these changes is a 1.20% increase to VSP rates. This increase includes any impact of secular trend.

For Plans Utilizing the Davis Vision Network:

1. We have reset our manual's Davis 10+ Secular Trend Factor to be effective from 8/1/2012 to 9/30/2012. Based on internal company experience, we have set the 10+ Secular Trend factor to 0.9908 (vs. 0.9725 last quarter), an increase of 1.88%. This factor will increase by 0.813% per quarter starting 10/1/2012 (our previous assumption was 0.625% per quarter).
2. We have reset our manual's Davis <10 Secular Trend Factor to be effective from 8/1/2012 to 9/30/2012. Based on internal company experience, we have set the <10 Secular Trend factor to 1.1181 (vs. 1.09745 last quarter), an increase of 1.88%. This factor will increase by 0.813% per quarter starting 10/1/2012 (our previous assumption was 0.625% per quarter).

The combined effect of these changes is a 1.88% increase to Davis Vision rates. This increase includes any impact of secular trend.



These changes are based on an analysis of internal company data using a pricing trend assumption of 4.0% for VSP and 2.5% for Davis.

I. Indication if New or Modified

This is a new filing for the District of Columbia

J. Comparison to Status Quo

These changes result in a 1.25% aggregate change to DC premium vision rates.

K. Summary of How Each Proposed Modification Differs from Corresponding Current/Approved Rate/Methodology

Please see section H above.

L. Summary of Each Proposed New Rule

We are not requesting any rule changes.

M. Overall Premium Impact of Filing on DC Policy holders

These changes result in a \$13,085 aggregate increase to DC premium rates.

N. Filed Minimum Required Loss Ratio

Guardian's target loss is 59.4%.

O. Interest Rate Assumptions

We do not have interest rate assumption due to the short-term nature of the Vision product.

P. Trend Assumptions

The annual trend assumption utilized in pricing is 4.0% for VSP business, and 2.5% for Davis. This reflects our best estimate of our long term claim cost trend.

Q. Persistency

The Guardian's product is an annually renewable term product and therefore no persistency assumption is incorporated into the pricing.

R. Actuarial Certification

Please see the attached certification.

The Guardian Life Insurance Company of America, New York, NY



ACTUARIAL CERTIFICATION

In my opinion the premium rates and rating methodology to which this certification applies are neither excessive, inadequate, nor unfairly discriminatory, and they meet the requirements of the insurance laws and regulations of the District of Columbia.

David Ferrari

David Ferrari, FSA, MAAA
Assistant Actuary
Group Products

7/17/2012

Date

DC - VSP	Period: 4/1/11 - 3/31/12				State Rate Filing Data	
CaseSize	Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9	18	92	\$18,309	\$7,819	42.7%	
10-15	5	72	\$10,561	\$4,343	41.1%	
16-49	29	859	\$130,565	\$61,132	46.8%	
50-99	13	847	\$141,425	\$75,808	53.6%	
100-249	4	666	\$96,645	\$49,402	51.1%	
250+	3	4,193	\$570,690	\$531,805	93.2%	
Grand Total	72	6,728	\$968,195	\$730,308	75.4%	

DC - Davis	Period: 4/1/11 - 3/31/12				State Rate Filing Data	
CaseSize	Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
16-49	3	74	\$7,096	\$2,714	38.3%	
50-99	3	224	\$20,458	\$8,624	42.2%	
100-249	1	131	\$8,287	\$1,768	21.3%	
250+	1	684	\$42,776	\$18,887	44.2%	
Grand Total	8	1,112	\$78,616	\$31,993	40.7%	

Nationwide - VSP	Period: 4/1/11 - 3/31/12				State Rate Filing Data	
CaseSize	Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9	4,867	24,830	\$4,165,061	\$2,283,089	54.8%	
10-15	2,103	26,044	\$3,934,786	\$2,278,471	57.9%	
16-49	4,711	133,623	\$20,541,799	\$12,302,049	59.9%	
50-99	1,730	117,857	\$17,122,236	\$10,960,462	64.0%	
100-249	1,048	154,702	\$21,934,786	\$14,866,371	67.8%	
250+	353	180,490	\$22,480,067	\$16,152,984	71.9%	
Grand Total	14,812	637,546	\$90,178,736	\$58,843,427	65.3%	

Nationwide - Davis	Period: 4/1/11 - 3/31/12				State Rate Filing Data	
CaseSize	Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9	1,107	5,913	\$664,649	\$403,254	60.7%	
10-15	649	8,152	\$947,920	\$573,242	60.5%	
16-49	1,573	45,531	\$5,339,678	\$3,158,159	59.1%	
50-99	644	44,167	\$5,129,510	\$3,249,137	63.3%	
100-249	346	49,190	\$5,736,075	\$3,643,669	63.5%	