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November 2, 2009

The Hon. Gennet Purcell, Commissioner  
Department of Insurance, Securities and Banking  
810 First Street NE, Suite 701  
Washington, DC 20002

Re: Surplus Review of Group Hospitalization and Medical Services, Inc.  
09-MIE-001

Dear Commissioner Purcell:

The District of Columbia Appleseed Center for Law and Justice, Inc. ("DC Appleseed") respectfully submits the following documents for the DISB's consideration and to be entered into the official record as part of the Group Hospitalization and Medical Services, Inc. excess surplus review examination, a hearing for which was held on September 10 and 11, 2009.

This filing consists of the following: a cover memorandum by DC Appleseed; Covington and Burling, LLP's legal analysis of the Medical Insurance Empowerment Amendment Act of 2008 (MIEAA); a rebuttal and report prepared by Actuarial Risk Management; and an analysis by Dr. Deborah Chollet, Senior Fellow at Mathematica Policy Research, Inc.

DC Appleseed respectfully requests a waiver of the 8 page limit for a rebuttal in the Emergency and Proposed Rulemaking (56 DCR 5666, § 4602.4). The enclosed filings include not only rebuttal statements, but also responses to DISB's requests made at the hearing for additional analysis, and supplemental testimony.

Thank you.

Yours truly,

Walter Smith  
Executive Director

Cc Mrs. Leslie Johnson, Hearing Officer  
Phillip Barlow, Associate Commissioner  
Mr. Stephen Taylor, General Counsel  
Carmenita Snowden, Executive Assistant

*Affiliations listed only for purposes of identification*

