

If an examination is conducted, the State Corporation Commission ("Commission") must determine, based on the findings of the examination, if the impact on GHSI is harmful to residents of Virginia. If the Commission does make such determination, it is required to issue an order to protect the residents of Virginia.

The order may include a prohibition on GHSI subsidizing the program of benefits for residents of The District of Columbia or Maryland through:

1. Premiums charged or otherwise allocable to residents of Virginia; or
2. The use of earned surplus attributable to residents of Virginia.

The law further requires that the determination of premiums charged to Virginia residents and the determination of surplus attributable to Virginia residents must be based on the number of residents in Virginia compared with the number of residents in other states covered by GHSI.

Again, thank you again for the opportunity to comment.

Respectfully submitted,



Donald C. Beatty
Senior Counsel