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**NOV 19 2009**

OFFICE OF  
INSURANCE REGULATION  
Decetted by: EE

OFFICE OF INSURANCE REGULATION

**KEVIN M. McCARTY**  
COMMISSIONER

IN THE MATTER OF:

CITIZENS PROPERTY  
INSURANCE CORPORATION  
\_\_\_\_\_ /

CASE NO.: 107075-09

ORDER

TO: Scott Wallace  
President  
Citizens Property Insurance Corporation  
101 North Monroe Street, Suite 1000  
Tallahassee, Florida 32301-1546

THIS CAUSE came on before the State of Florida, Office of Insurance Regulation (hereinafter referred to as the "OFFICE") upon the filing by Citizens Property Insurance Corporation (hereinafter referred to as "CITIZENS") of Rate Filing Nos. FCP 09-18541, FCP 09-18543, FCP 09-18544, FCC 09-18479, FCC 09-18480, and FCC 09-18481. The OFFICE held a public hearing on November 10, 2009, that was televised statewide by The Florida Channel. At the hearing, public comments were made by persons in attendance, including the grass-roots organization FIRM (Fair Insurance Rates in Monroe), and the OFFICE announced that the public could comment by e-mail. Additional materials were received by the OFFICE after the hearing and made a part of the record. The OFFICE, now having considered the complete record for the above-referenced filings and being otherwise fully advised in the premises, hereby finds as follows:

1. The OFFICE has jurisdiction over the subject matter and parties herein.
2. CITIZENS was created by statute with the public purpose to ensure the existence of an orderly market for property insurance for Floridians and Florida businesses. The Legislature expressed its intent in CITIZENS' enabling statute that "affordable property insurance be provided, as long as necessary, through Citizens Property Insurance Corporation, a government entity that is an integral part of the state, and that is not a private insurance company." Section 627.351(6)(a)1., Florida Statutes (2009).

3. In accordance with Section 627.351(6)(n) of the Florida Statutes, CITIZENS' rates must meet the following requirements:

- (n)1. Rates for coverage provided by the corporation shall be actuarially sound and subject to the requirements of s. 627.062, except as otherwise provided in this paragraph. The corporation shall file its recommended rates with the office at least annually. The corporation shall provide any additional information regarding the rates which the office requires. The office shall consider the recommendations of the board and issue a final order establishing the rates for the corporation within 45 days after the recommended rates are filed. The corporation may not pursue an administrative challenge or judicial review of the final order of the office.

2. In addition to the rates otherwise determined pursuant to this paragraph, the corporation shall impose and collect an amount equal to the premium tax provided for in s. 624.509 to augment the financial resources of the corporation.

3. After the public hurricane loss-projection model under s. 627.06281 has been found to be accurate and reliable by the Florida Commission on Hurricane Loss Projection Methodology, that model shall serve as the minimum benchmark for determining the windstorm portion of the corporation's rates. This subparagraph does not require or allow the corporation to adopt rates lower than the rates otherwise required or allowed by this paragraph.

4. The rate filings for the corporation which were approved by the office and which took effect January 1, 2007, are rescinded, except for those rates that were lowered. As soon as possible, the

corporation shall begin using the lower rates that were in effect on December 31, 2006, and shall provide refunds to policyholders who have paid higher rates as a result of that rate filing. The rates in effect on December 31, 2006, shall remain in effect for the 2007 and 2008 calendar years except for any rate change that results in a lower rate. The next rate change that may increase rates shall take effect pursuant to a new rate filing recommended by the corporation and established by the office, subject to the requirements of this paragraph.

5. Beginning on July 15, 2009, and each year thereafter, the corporation must make a recommended actuarially sound rate filing for each personal and commercial line of business it writes, to be effective no earlier than January 1, 2010.

4. The process described in the above-referenced statutory provisions requires the OFFICE to establish the rates for CITIZENS by Final Order. This differs from the process for an insurance company, wherein the OFFICE approves or disapproves the rates filed. CITIZENS was required under Florida law to file rate recommendations with the OFFICE beginning July 15, 2009, for new rates to be effective no earlier than January 1, 2010.

5. CITIZENS submitted the following High Risk Account ("HRA") rate filings to the OFFICE, which are the subject of this Order:

- FCP 09-18541 (Homeowners HRA)
- FCP 09-18543 (Dwelling Fire HRA)
- FCP 09-18544 (Mobile Homeowners HRA)
- FCC 09-18479 (Commercial Property Nonresidential HRA)
- FCC 09-18480 (Commercial Property Residential HRA – Excluding Condo Assn.)
- FCC 09-18481 (Commercial Property Residential HRA – Condo Assn.)

#### Homeowners (HRA)

6. On or about October 7, 2009, CITIZENS filed with the OFFICE Rate Filing No. FCP 09-18541 for its homeowners HRA wind-only coverage program. CITIZENS initially proposed an overall rate change of 7.5% with an effective date of January 1, 2010, for new and renewal business. CITIZENS submitted additional information on November 9, 2009. On November 13, 2009, CITIZENS amended the effective date of its proposed rate change to February 1, 2010, for new and renewal business.

7. The OFFICE reviewed the information provided by CITIZENS and hereby establishes the rate that CITIZENS shall implement to reflect an overall average statewide rate increase of 5.2% to meet the requirements of Section 627.351, Florida Statutes. A chart indicating the approved rate effects by territory for Rate Filing No. FCP 09-18541 is attached hereto as “**Attachment A.**”

8. Within thirty (30) days of the date of this Order, CITIZENS shall submit to the OFFICE final manual pages and any necessary revisions to the Homeowners Rate Collection System information.

#### Dwelling Fire (HRA)

9. On or about October 7, 2009, CITIZENS filed with the OFFICE Rate Filing No. FCP 09-18543, for its dwelling fire HRA wind-only coverage program. CITIZENS initially proposed an overall rate change of 5.9% with an effective date of January 1, 2010, for new and renewal business. CITIZENS submitted additional information on November 9, 2009. On November 13, 2009, CITIZENS amended the effective date of its proposed rate change to February 1, 2010, for new and renewal business.

10. The OFFICE reviewed the information provided by CITIZENS and hereby establishes the rate that CITIZENS shall implement to reflect an overall average statewide rate increase of 4% to meet the requirements of Section 627.351, Florida Statutes. A chart indicating the approved rate effects by territory for Rate Filing No. FCP 09-18543 is attached hereto as **“Attachment B.”**

11. Within thirty (30) days of the date of this Order, CITIZENS shall submit to the OFFICE final manual pages and any necessary revisions to the Dwelling Fire Rate Collection System information.

Mobile Homeowners (HRA)

12. On or about October 7, 2009, CITIZENS filed with the OFFICE Rate Filing No. FCP 09-18544, for its mobile homeowners HRA wind-only coverage program. CITIZENS proposed an overall rate change of 11.8% with an effective date of January 1, 2010, for new and renewal business. CITIZENS submitted additional information on November 9, 2009. On November 13, 2009, CITIZENS amended the effective date of its proposed rate change to February 1, 2010, for new and renewal business.

13. The OFFICE reviewed the information provided by CITIZENS and hereby establishes the rates that CITIZENS shall implement to reflect an overall average statewide rate increase of 11% to meet the requirements of Section 627.351, Florida Statutes. A chart indicating the approved rate effects by territory for Rate Filing No. FCP 09-18544 is attached hereto as **“Attachment C.”**

14. Within thirty (30) days of the date of this Order, CITIZENS shall submit to the OFFICE final manual pages and any necessary revisions to the Mobile Homeowners Rate Collection System information.

15. CITIZENS offers coverage on an Actual Cash Value basis for pre-1994 mobile homes. Therefore, to be certain that policyholders are fully informed, the OFFICE requires the following:

a) On or before January 1, 2011, CITIZENS shall revise its procedures for all pre-1994 Mobile Homeowners policies such that renewal bills reflect actual cash value amounts.

b) On or before January 1, 2011, CITIZENS shall submit a report to the OFFICE on the impact of the change to Actual Cash Value coverage for pre-1994 Mobile Homeowner policyholders. The report shall include the following for each affected policyholder: 1) the initial issue date and the coverage amount of each policy on the initial issue date; 2) the effective date of the Actual Cash Value change for each policyholder; and 3) the amount of the Actual Cash Value for each policyholder as of the effective date of the change.

Commercial Nonresidential (HRA)

16. On or about October 6, 2009, CITIZENS submitted to the OFFICE Rate Filing No. FCC 09-18479, for its commercial property nonresidential HRA wind-only coverage program. CITIZENS initially proposed an overall rate change of 9.9% with an effective date of January 1, 2010, for new and renewal business. CITIZENS submitted additional information on November 9, 2009. On November 13, 2009, CITIZENS amended the effective date of its proposed rate change to February 1, 2010, for new and renewal business.

17. The OFFICE reviewed the information provided by CITIZENS and hereby establishes the rate that CITIZENS shall implement to reflect an overall average statewide rate increase of 9.3% to meet the requirements of Section 627.351, Florida Statutes. A chart indicating the approved rate effects by territory for Rate Filing Nos. FCC 09-18479 is attached hereto as “**Attachment D.**”

18. Within thirty (30) days of the date of this Order, CITIZENS shall submit to the OFFICE final manual pages and any necessary revisions to the Commercial Nonresidential Rate Collection System information.

19. In its July 2010 rate filings, CITIZENS must apply a longer time period in the development of the non-hurricane wind provision in its rate indication, as CITIZENS has done in its personal line rate filings.

Ex. Condo and Condo Commercial Residential (HRA)

20. On or about October 6, 2009, CITIZENS filed with the OFFICE Rate Filing Nos. FCC 09-18480 for Ex-Condo Association and FCC 09-18481 for Condo Association. Both rate filings covered CITIZENS' commercial property residential HRA wind-only coverage program. The two CITIZENS' rate filings proposed the same overall rate change of 9.6% with an effective date of January 1, 2010, for new and renewal business. CITIZENS submitted additional information on November 9, 2009. On November 13, 2009, CITIZENS amended the effective date of its proposed rate change to February 1, 2010, for new and renewal business.

21. The OFFICE reviewed the information provided by CITIZENS and hereby establishes the rate that CITIZENS shall implement to reflect an overall average statewide rate increase of 9.4% to meet the requirements of Section 627.351, Florida Statutes. A chart indicating the approved rate effects by territory for Rate Filing Nos. FCC 09-18480 and FCC 09-18481 are attached hereto as "**Attachment E.**"

22. Within thirty (30) days of the date of this Order, CITIZENS shall submit to the OFFICE final manual pages and any necessary revisions to the Commercial Residential Rate Collection System information.

23. CITIZENS included indications in these two filings based not only on the manually-rated risks for commercial residential structures, but also the experience for those commercial residential structures that are “individually risk rated.” Although the OFFICE did allow individual risk rating for those policies in excess of 10 million dollars in total insured value, the OFFICE does not agree that the experience for this business should be included with the data for the manually rated business in the rate filing for the manually rated business. Therefore, prior to the filing due July 2010, CITIZENS must segregate the data and separately show the experience for the business that is subject to the rate filing.

24. CITIZENS combined the data for Condo Association and Other Non-Condo Association Residential in its rate indications in these two filings, which was not in accordance with Florida Administrative Code Rule 69O-170.0142 (“Rule”). In its July 2010 rate filings, CITIZENS shall provide separate rate indications for Condo Association and Non-Condo Association risks as required by the Rule.

25. In its July 2010 rate filings, CITIZENS must apply a longer time period in the development of the non-hurricane wind provision in its rate indication, as CITIZENS has done in its personal line rate filings.

#### Subsequent Rate Filings

26. The rates have been established in accordance with current regulations. Matters for consideration in future rate filings include the following:

a) CITIZENS used an Insurance Services Office (ISO) excess wind factor that was developed for HO-3 or Homeowners insurance policies. As discussed at the hearing, this factor was developed for HO-3 (Homeowners) policies, and not for HO-4 (Renters), HO-6 (Condo Unit Owners), or MHO-3 (Mobile Homeowners) policies. Subsequent rate filings that



apply an Insurance Services Office HO-3 (Homeowners) excess wind factor to determine the Projected Non-Hurricane Catastrophe Losses for HO-4 (Tenants), HO-6 (Condo Unit Owners), or MHO-3 (Mobile Homeowners) shall demonstrate that this application is reasonable.

b) Subsequent rate filings that include a Residual Market Contingency Provision shall provide supporting data and calculations that demonstrate that the provision complies with Florida Administrative Code Rule 69O-170.003. The support shall consider that CITIZENS applies a tax-exempt surcharge of 1.75% in addition to the inclusion of a premium tax provision in the rate indications. Also, the support shall consider that, if a deficit is incurred, a CITIZENS' policyholder surcharge of up to 15% must be levied against all policyholders of the corporation.

c) Concerning the supporting data for proposed revisions by territory in subsequent rate filings:

- i. Support shall be provided for any selected territorial caps.
- ii. Consideration shall be given to the credibility of the Hurricane Loss Ratios and to the use of territory groupings in a credibility weighting procedure.

d) Revenue from the 15% Catastrophe Financing Surcharge must be reflected in rate filing indications.

e) CITIZENS must provide information on actual mitigation features in its model exposure data, which must be reflected in the model output to the fullest extent possible.

27. At the public hearing, FIRM presented its case that the models used in the filings to develop the windstorm rates did not accurately predict risk for Monroe County because of the following:

- a) The models do not reflect Monroe County's high construction standards;
- b) The models do not accurately model roof cover and sheathing techniques used in Monroe County;
- c) The models overstate the strike probabilities for Monroe County compared to other coastal areas; and
- d) The models do not accurately allocate damage from wind versus water (storm surge).

The OFFICE attempted to quantify the effects of some of these issues on the rate indications for Monroe County. The Public Model that was used in the filing was reviewed by the Hurricane Loss Projection Methodology Commission, which concluded in its report that the maximum additional discount for metal roofs was one percent. Therefore, this information would not likely change CITIZENS' rate need for this year, but may affect the indication for future years at least by a minimal amount.

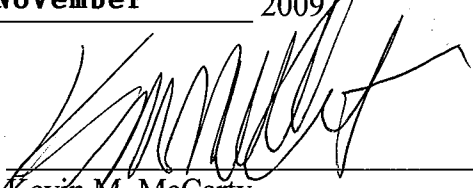
28. FIRM presented additional information on other issues for which the OFFICE has insufficient reliable information upon which to quantify any effect on the indications. Therefore, at least ninety (90) days prior to the submission of its July 2010 filings, CITIZENS must provide its response to each of the issues raised by FIRM with respect to the Public Model for Personal Lines and RMS for Commercial Lines as reflected in the documentation presented by FIRM at the public hearing on November 10, 2009.

THEREFORE, Rates as detailed herein are ESTABLISHED and APPROVED for Rate Filing Nos. FCP 09-18541, FCP 09-18543, FCP 09-18544, FCC 09-18479, FCC 09-18480, and FCC 09-18481.

FURTHER, all terms and conditions contained herein are hereby ORDERED.

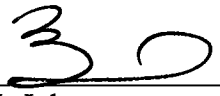
DONE AND ORDERED this 19th day of November 2009



  
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Kevin M. McCarty  
Commissioner  
Office of Insurance Regulation

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of this ORDER was sent by Certified Mail to: Scott Wallace, President, Citizens Property Insurance Corporation, 101 North Monroe Street, Suite 1000, Tallahassee, Florida 32301, this 19<sup>th</sup> day of November 2009.

  
\_\_\_\_\_  
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COPIES FURNISHED TO:

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OFFICE OF INSURANCE REGULATION				
CITIZENS HOMEOWNERS HIGH RISK ACCOUNT FILING FCP 09-18541				
APPROVED RATE CHANGE INCLUDING CASH BUILDUP				
		HO-3 POLICY TYPE	HO-4 POLICY TYPE	HO-6 POLICY TYPE
Region	Territory	Percent Change	Percent Change	Percent Change
Bay	59	-8.8%	-9.4%	-9.4%
Brevard	60	1.0%	-9.3%	-9.3%
Broward	45	11.3%	-9.3%	-9.3%
Broward	46	11.5%	-9.3%	10.8%
Broward	47	11.5%	-9.3%	1.0%
Broward	48	11.5%	-9.3%	-6.1%
Charlotte	61	11.5%	-9.3%	3.4%
Collier	62	-8.8%	-9.3%	-7.8%
Dade	22	11.4%	-9.3%	-9.3%
Dade	23	11.5%	-9.3%	10.8%
Dade	24	11.5%	-9.3%	10.8%
Dade	25	11.5%	-9.3%	-5.1%
Dade	26	11.5%	-9.3%	10.8%
Dade	27	11.5%	-9.3%	2.8%
Dade	28	11.5%	-9.3%	-6.1%
Dade	29	0.6%	-9.3%	-9.3%
Duval	41	-9.0%	-9.5%	-9.5%
Escambia	52	-8.8%	-9.3%	-9.3%
Escambia	53	-8.8%	-9.3%	-9.3%
Escambia	54	-8.9%	-9.4%	-9.4%
Flagler	83	-5.2%	-9.4%	-9.4%
Franklin	65	-8.8%	-9.4%	-9.4%
Gulf	66	-8.8%	-9.4%	-9.4%
Hernando	56	-8.8%	-9.4%	0.0%
Indian	76	-8.7%	-9.3%	-1.9%
Lee	17	10.7%	-9.3%	-9.3%
Lee	18	6.5%	-9.3%	-9.3%
Lee	19	11.5%	-9.4%	5.8%
Lee	20	11.5%	-9.4%	-9.4%
Levy	57	-8.9%	-9.5%	-9.4%
Manatee	68	0.6%	-9.3%	-9.3%
Monroe	90	11.5%	-9.3%	10.8%
Nassau	69	-9.0%	-9.6%	-9.6%
Okaloosa	70	-8.8%	-9.3%	-9.3%
Palm	94	11.5%	-9.3%	10.8%
Palm	95	9.2%	-9.3%	-1.0%
Palm	96	6.7%	-9.3%	-9.3%
Palm	97	11.5%	-9.3%	-9.3%
Pasco	88	-8.8%	-9.4%	-9.4%
Pinellas	42	-3.2%	-9.4%	-9.4%
Santa	92	-8.8%	-9.3%	-9.3%
Sarasota	49	-8.8%	-9.3%	-9.3%
Sarasota	50	-8.8%	-9.4%	-9.4%
Sarasota	51	-8.8%	-9.4%	-9.4%
St. Johns	71	-9.0%	-9.5%	-9.5%
St. Lucie	77	-8.7%	-9.3%	-8.5%
Volusia	14	-3.2%	-9.4%	-9.4%
Volusia	15	11.3%	-9.5%	-9.5%
Volusia	16	-9.0%	-9.5%	-4.0%
Wakulla	58	-8.9%	-9.5%	-9.5%
Walton	75	-8.8%	-9.4%	-9.4%
Total:		5.9%	-9.3%	-3.1%

OFFICE OF INSURANCE REGULATION							
CITIZENS DWELLING FIRE HIGH RISK ACCOUNT FILING 09-18543							
APPROVED RATE CHANGES INCLUDING CASH BUILDUP OF CATASTROPHE FUND							
Region	Territory	Current Percent Change (%)					
Bay	59	-8.8%					
Brevard	60	1.0%					
Broward	45	11.3%					
Broward	46	11.5%					
Broward	47	11.5%					
Broward	48	11.5%					
Charlotte	61	11.5%					
Collier	62	-8.8%					
Dade	22	11.4%					
Dade	23	11.5%					
Dade	24	11.5%					
Dade	25	11.5%					
Dade	26	11.5%					
Dade	27	11.5%					
Dade	28	11.5%					
Dade	29	0.6%					
Duval	41	-9.0%					
Escambia	52	-8.8%					
Escambia	53	-8.8%					
Escambia	54	-8.9%					
Flagler	83	-5.2%					
Franklin	65	-8.8%					
Gulf	66	-8.8%					
Hernando	56	-8.8%					
Indian River	76	-8.7%					
Lee	17	10.7%					
Lee	18	6.5%					
Lee	19	11.5%					
Lee	20	11.5%					
Levy	57	-8.9%					
Manatee	68	0.6%					
Monroe	90	11.5%					
Nassau	69	-9.0%					
Okaloosa	70	-8.8%					
Palm Beach	94	11.5%					
Palm Beach	95	9.2%					
Palm Beach	96	6.7%					
Palm Beach	97	11.5%					
Pasco	88	-8.8%					
Pinellas	42	-3.2%					
Santa Rosa	92	-8.8%					
Sarasota	49	-8.8%					
Sarasota	50	-8.8%					
Sarasota	51	-8.8%					
St. Johns	71	-9.0%					
St. Lucie	77	-8.7%					
Volusia	14	-3.2%					
Volusia	15	11.3%					
Volusia	16	-9.0%					
Wakulla	58	-8.9%					
Walton	75	-8.8%					
Total:		4.0%					

OFFICE OF INSURANCE REGULATION			
CITIZENS MOBILEHOME HIGH RISK ACCOUNT FILING FCP 09-18544			
APPROVED RATE CHANGE INCLUDING CASH BUILDUP			
		MHO-3 POLICY TYPE	MO-4 POLICY TYPE
Region	Territory	Percent Change	Percent Change
Bay	59	11.7%	0.0%
Brevard	60	11.8%	2.4%
Broward	45	11.8%	0.0%
Broward	46	0.0%	0.0%
Broward	47	11.8%	0.0%
Broward	48	11.8%	0.0%
Charlotte	61	11.8%	0.0%
Collier	62	11.8%	2.4%
Dade	22	-3.9%	0.0%
Dade	23	11.8%	0.0%
Dade	24	0.0%	0.0%
Dade	25	0.0%	0.0%
Dade	26	0.0%	0.0%
Dade	27	0.0%	0.0%
Dade	28	-3.9%	2.4%
Dade	29	-3.9%	0.0%
Duval	41	0.0%	0.0%
Escambia	52	11.8%	0.0%
Escambia	53	11.7%	0.0%
Escambia	54	5.4%	0.0%
Flagler	83	11.6%	1.8%
Franklin	65	11.7%	0.0%
Gulf	66	11.7%	0.0%
Hernando	56	11.6%	0.0%
Indian River	76	0.0%	0.0%
Lee	17	11.8%	0.0%
Lee	18	11.8%	2.4%
Lee	19	11.8%	0.0%
Lee	20	11.8%	0.0%
Levy	57	11.7%	0.0%
Manatee	68	11.8%	0.0%
Monroe	90	11.8%	2.4%
Nassau	69	0.0%	0.0%
Okaloosa	70	-4.0%	0.0%
Palm Beach	94	11.8%	2.4%
Palm Beach	95	11.8%	0.0%
Palm Beach	96	11.8%	0.0%
Palm Beach	97	11.8%	0.0%
Pasco	88	11.7%	2.1%
Pinellas	42	0.0%	0.0%
Santa Rosa	92	11.8%	0.0%
Sarasota	49	11.8%	2.3%
Sarasota	50	11.8%	2.3%
Sarasota	51	11.7%	0.0%
St. Johns	71	11.4%	0.0%
St. Lucie	77	11.8%	0.0%
Volusia	14	11.7%	0.0%
Volusia	15	11.6%	0.0%
Volusia	16	0.0%	0.0%
Wakulla	58	-4.2%	0.0%
Walton	75	11.7%	0.0%
Total:		11.0%	2.2%



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WIND ONLY -- COMMERCIAL NON-RESIDENTIAL (HRA - CNRW)  
TERRITORIAL RATE CHANGES

<u>County</u>	<u>Territory Number</u>	12/31/2008 Inforce Premium at current rate level <u>With 15% Surch.</u>	Capped Terr. Rate <u>Change</u>
Bay	59	974,461	10.0%
Brevard	60	730,790	10.0%
Broward	35	6,598,383	10.0%
Broward	36	1,748,134	10.0%
Broward	37	6,049,652	10.0%
Charlotte	61	45,307	10.0%
Collier	62	923,520	10.0%
Dade	30	4,068,457	10.0%
Dade	31	1,040,558	10.0%
Dade	32	4,682,538	10.0%
Dade	34	5,558,309	10.0%
Duval	41	164,506	-8.3%
Escambia	43	1,988,803	10.0%
Escambia	63	259,345	10.0%
Flagler	64	150,031	-8.3%
Flagler	78	7,583	-6.3%
Franklin	65	159,813	10.0%
Gulf	66	58,925	10.0%
Hernando	56	22,740	10.0%
Indian River	76	637,501	10.0%
Lee	67	1,548,534	10.0%
Lee	79	128,809	10.0%
Levy	57	53,438	10.0%
Manatee	68	268,830	10.0%
Monroe	85	4,811,667	10.0%
Monroe	86	4,601,757	10.0%
Nassau	69	35,964	-8.3%
Okaloosa	70	249,691	10.0%
Palm Beach	38	11,693,653	10.0%
Palm Beach	87	2,330,497	10.0%
Pasco	88	297,143	-0.2%
Pinellas	42	1,324,134	10.0%
Saint Johns	71	160,122	-8.3%
Saint Lucie	77	70,991	10.0%
Santa Rosa	72	15,121	10.0%
Santa Rosa	80	197,647	10.0%
Sarasota	73	2,583,813	10.0%
Sarasota	81	1,639,992	10.0%
Volusia	44	1,616,268	-8.3%
Volusia	74	1,190,007	10.0%
Wakulla	58	25,356	10.0%
Walton	75	1,202,690	5.9%
<b>TOTAL</b>		<b>71,915,481</b>	<b>9.3%</b>

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**WIND ONLY -- COMMERCIAL RESIDENTIAL (HRA- CRW)**  
**TERRITORIAL RATE CHANGES**

	<b>Territory</b>	<b>12/31/2008</b>	<b>Capped</b>
		<b>Inforce</b>	<b>Terr.</b>
		<b>Premium</b>	<b>Rate</b>
		<b>at current</b>	<b>Change</b>
	<b>Number</b>	<b>rate level</b>	<b>Including</b>
		<b>With 15% Surch.</b>	<b>FHCF Build-Up</b>
Bay	59	3,896,747	-7.2%
Brevard	60	3,311,231	11.3%
Broward	35	9,933,650	11.3%
Broward	36	16,523,821	11.3%
Broward	37	11,457,502	11.3%
Charlotte	61	1,250,310	11.3%
Collier	62	14,469,088	11.3%
Dade	30	22,951,607	11.3%
Dade	31	15,477,764	11.3%
Dade	32	12,187,192	11.3%
Dade	34	19,033,910	11.3%
Duval	41	1,001,772	-8.9%
Escambia	43	603,338	-0.2%
Escambia	63	2,397,901	11.3%
Flagler	64	664,498	-8.9%
Flagler	78	0	-8.9%
Franklin	65	65,210	8.4%
Gulf	66	101,103	5.0%
Hernando	56	0	-8.9%
Indian River	76	2,249,130	11.3%
Lee	67	5,657,065	11.3%
Lee	79	1,511,215	11.3%
Levy	57	184,912	11.3%
Manatee	68	2,944,652	11.3%
Monroe	85	4,849,899	11.3%
Monroe	86	2,756,426	11.3%
Nassau	69	862,356	-8.9%
Okaloosa	70	3,812,215	6.1%
Palm Beach	38	15,195,043	11.3%
Palm Beach	87	21,671,529	11.3%
Pasco	88	1,574,460	-8.9%
Pinellas	42	14,086,270	11.3%
Saint Johns	71	1,774,122	-8.9%
Saint Lucie	77	2,327,299	11.3%
Santa Rosa	72	605,649	3.0%
Santa Rosa	80	115,072	5.2%
Sarasota	73	12,976,282	11.3%
Sarasota	81	2,182,566	11.3%
Volusia	44	973,310	-8.9%
Volusia	74	7,342,529	-8.9%
Wakulla	58	28,248	4.8%
Walton	75	5,296,955	-4.6%
<b>TOTAL</b>		<b>246,303,849</b>	<b>9.4%</b>