

**MASSACHUSETTS 2013  
GROUP MARKETING NEW/RENEWAL  
AFFIDAVIT**

Attached is the documentation required for the application for the listed  
Commerce Insurance Company 2013 Group Marketing clients.

We have verified that it is the intention of each of the following clients to  
participate in the Group Marketing program within their organization for the  
year 2013 and have confirmed their participation to them in writing:

(See attached 2013 193R Application Spreadsheet)

You may contact any of our clients to verify information and confirm  
participation.

A handwritten signature in cursive script that reads "Edward Dabrowski".

Edward Dabrowski  
Product Analyst Senior, Underwriting  
The Commerce Insurance Company

2013 193R Application Spreadsheet for The Commerce Insurance Company

Insurance Company	Group Name	Street Address	City/Town	State	Zip	Auto (A) or Home (H)	Proposed Rate Dev. (%)	Proposed Effective Date	CU, E, M, U Group Type	Total Number in Group	Eligible Number in Group	Number of Current Insureds	Original Plan Date	Producer or Marketing Representative	Producer or Marketing Representative Contact Information	Experience Submitted (Yes or No)
Commerce	dPer Club, LLC	92 State Street, Suite 600	Boston	MA	02109	A	4.0%	07/01/2013	M	3970	3970	0	01/14/2013	Public Employee Insurance, Inc.	(617) 596-1376	No

**2013 EXPENSE EXHIBIT FOR ALL 193R GROUP MARKETING PLANS**

Insurers are required to submit the expense ratios underlying their current rates and the expense ratio or average expense per vehicle associated with the group marketing plan

<b>INSURANCE COMPANY</b>	<b>GROUPNAME</b>	<b>(1) Expenses Assumed In Insurer's Rates Currently On File</b>	<b>(2) Expenses Associated With Group Marketing Plan</b>	<b>(3) Reasons for Expensed Difference</b>	<b>(4) Requested Group Rate Deviation</b>
Commerce	dPer Club, LLC	24.6%	20.9%	Commision contribution by agent. Lower ULAE* Lower Acquisition Costs**	4.0%

\* - Group business has a lower loss ratio than non-group business, resulting in reduced ULAE for group business when compared to ULAE for all business.

\*\* - Reduced costs of acquisition include lower advertising costs