

**MASSACHUSETTS 2015
GROUP MARKETING NEW/RENEWAL
AFFIDAVIT**

Attached is the documentation required for the application for the listed
Commerce Insurance Company 2015 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 2015 and have confirmed their participation to them in writing:

(See attached 2015 193R Application Spreadsheet)

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



Edward Dabrowski
Product Analyst Senior, Underwriting
The Commerce Insurance Company

2015 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	Crosby's Markets	125 Canal Street	Salem	MA	01970	A	7.0%	5/15/2015	E	220	150	0	New	Archer Insurance	(978) 922-4600	No
Commerce	First Priority Credit Union	100 Swift Street	East Boston	MA	02138	A	4.0%	5/15/2015	CU	7,165	6,500	0	New	Rizzo Insurance Group Agency, Inc.	(781) 289-7445	No
Commerce	Sager Electronics	19 Leona Drive	Middleborough	MA	02346	A	6.0%	5/15/2015	E	295	130	0	New	Lehrer & Madden, Inc.	(508) 650-1202	No

2015 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

INSURANCE		(1)	(2)	(3)	(4)
<u>COMPANY</u>	<u>GROUP NAME</u>	Expenses Assumed In Insurer's Rates Currently On File	Expenses Associated With Group Marketing Plan	Reasons for Expensed Difference	Requested Group Rate Deviation
Commerce	First Priority Credit Union	25.8%	22.0%	Commision contribution by agent. Lower ULAE* Lower Acquisition Costs**	4.0%
Commerce	First Priority Credit Union	25.8%	21.0%	Commision contribution by agent. Lower ULAE* Lower Acquisition Costs**	6.0%
Commerce	Crosby's Markets	25.8%	20.0%	Commision contribution by agent. Lower ULAE* Lower Acquisition Costs**	7.0%

* - 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