

**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	Webster First Federal Credit Union	271 Greenwood Street	Worcester	MA	01607	A	4.0%	6/1/2015	CU	65,000	63,500	0	New	Webfirst Insurance, LLC	(800) 957-1455	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

<b>INSURANCE</b>		<b>(1)</b>	<b>(2)</b>	<b>(3)</b>	<b>(4)</b>
<b><u>COMPANY</u></b>	<b><u>GROUP NAME</u></b>	<b><u>Expenses Assumed In Insurer's Rates Currently On File</u></b>	<b><u>Expenses Associated With Group Marketing Plan</u></b>	<b><u>Reasons for Expensed Difference</u></b>	<b><u>Requested Group Rate Deviation</u></b>
Commerce	Webster First Federal Credit Union	25.8%	22.0%	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