

**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	Hometown Bank	31 Sutton Avenue	Oxford	MA	01540	A	4.0%	8/1/2015	E	137	121	0	New	Oxford Insurance Agency	(508) 987-0333	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>	<u>Expenses Assumed In Insurer's Rates Currently On File</u>	<u>Expenses Associated With Group Marketing Plan</u>	<u>Reasons for Expensed Difference</u>	<u>Requested Group Rate Deviation</u>
Commerce	Hometown Bank	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