

Allstate Insurance Company, Good Hands Repair Network
Referral Repair Shop Program Waiver Request

Pursuant to Massachusetts regulation 211 CMR 123.06, 2 (c); Allstate Insurance Company hereby requests a waiver specific to the number of required referral shops conveniently located for the claimant. Allstate Insurance Company has been writing auto insurance in the state of Massachusetts since 2009 and currently has a 2.26% market share.

Attached below are the Allstate Insurance Company 2017 August YTD auto items in force and notice count activity for the state of Massachusetts.

County	IIF	Notice Counts
Berkshire	1,217	158
Franklin	612	73
Hampshire	858	129
Hampden	4,619	639
Worcester	9,821	1354
Essex	10,688	1263
Middlesex	14,942	2640
Suffolk	3,760	1188
Norfolk	6,798	1049
Bristol	7,090	785
Plymouth	3,829	688
Barnstable	1,911	461
Dukes	262	28
Nantucket	169	6
Total	66,578	10,461

Based on our limited market share, the current needs of our customers would not warrant 5 shops within each geographic location. Based on our items in force and claim counts within the following geographic areas, we would provide at least one referral repair shop in each of the following geographic locations:

- Hampden County
- Essex County
- Middlesex County
- Suffolk County
- Norfolk County
- Bristol County
- Plymouth County
- Barnstable County

Until recently, there was a shop participating in the Worcester County market. We are in the process of identifying a replacement in that market for our customers.

Based upon our limited market share and notice count activity, Allstate Insurance Company customers would not currently have the need for referral repair shops in the following geographic locations:

- Berkshire County
- Franklin County
- Hampshire County

- Dukes County
- Nantucket County

Year to date in Massachusetts, 244 repairs have been completed by repair facilities that participate in the Allstate Good Hands Repair Network. Additional referral repair shops may be added to the Good Hands Repair Network program when and where the items in force and claim counts in each geographic location would require that.

Based on all of the provided information, we respectfully request that the Commissioner approve Allstate Insurance Company's request for a temporary shop waiver. We would also offer that it is not our intent to limit the number of referral repair shops, but rather meet the needs of the Massachusetts customer based on the specific claim volume within each geographic location in the state.

Thank you for your consideration, we would welcome your feedback and look forward to providing any additional information that you may require.

Respectfully,

Timothy Knapp
Regional Counsel
Allstate Insurance Company