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BY E-MAIL

November 7, 2008

Mr. Joe Bieniek
Title Insurance Working Group
National Association of Insurance Commissioners
2301 McGee Street, Suite 800
Kansas City, MO 64108-2662

RE: Statistical plan development

Dear Mr. Bieniek:

We received Superintendent Chavez' correspondence of October 14 concerning the creation of a nationwide statistical plan for the collection of revenue and expense data from title insurance agents and underwriters. Thank you for the opportunity to comment on the proposed content of the plan. It is my understanding that the American Land Title Association (ALTA) intends to respond to you on behalf of the title insurance industry. Old Republic reserves its right to comment further after we have seen ALTA's response.

However, we have one general observation, and that is that there may be difficulties collecting some of this information, especially in states where title insurance agents are not regulated. In other states where only non-attorney agents are regulated, the value of getting information from only a fraction of the agent population might be questionable. In addition, among the states, comparisons cannot easily be made because of different rating systems.

Thank you again for giving us a chance to weigh in on this issue. We look forward to providing additional input in the future. Should you have any questions, please feel free to contact me.

Very truly yours,

Ronald J. Blitenthal