

From: Alison Evers [mailto:AEVERS@stewart.com]
Sent: Tuesday, November 04, 2008 4:09 PM
To: Bieniek, Joe
Subject: Collecting Title Agent Expense Data

Dear Mr. Bieniek:

Thank you for the opportunity to comment on the NAIC's project to develop a nationwide statistical plan for capturing state-specific annual revenue and expense data from title insurance agents and underwriters for the purpose of measuring the profitability, competitiveness and reasonableness of title rates and charges. The October 14, 2008 letter solicits a response regarding the specific content of such a statistical plan, as well as appropriate and effective methods for collecting, auditing, compiling and using the plan's data.

Given the timing of your request (received in the middle of the third quarter end close process) and the extent of response requested, we are unable to give you meaningful feedback in such a short time frame. We therefore respectfully request an extension to the comment period. This will give our company and the American Land Title Association's Accounting Committee, of which I am a member, the opportunity to comment appropriately on this project.

Thank you in advance for your consideration.

Sincerely,

Alison Evers, CPA
Senior Vice President Regulatory Accounting Compliance Officer
Stewart Title Guaranty Company
1980 Post Oak Blvd., Suite 800
Houston, TX 77056
713-625-8036
713-629-2330 (fax)

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