

Fuller Comments.txt

From: Bryan Fuller [mailto:[bfuller@rector-associates.com](mailto:bfuller@rector-associates.com)]  
Sent: Thursday, January 22, 2009 9:35 AM  
To: Simpson, Pamela K.; Bieniek, Joe  
Subject: Title Insurance Issues Working Group Conference Call 1/28/09

Joe and Pam,

Thank you for sending this as I believe that it is a good first step to get some additional information on the title insurance industry. I have just one small suggestion regarding the following Note. I would change the language to say "gross of reinsurance" rather than "direct of reinsurance" as it could be confusing to people filling out the page when you mix the words "direct" and "reinsurance" in the same portion of the sentence. Perhaps it is understandable to everyone as is, but I think that indicating "gross" vs. "net" clarifies the intent of the policy information requested.

Regards,

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Note:

C. The amount of liability to be reported is the policy face (direct of reinsurance) in those cases not involving a simultaneous issue of multiple policies. In determining the amount of liability to be reported in case of simultaneous issue of an owners policy and a mortgage policy, include the higher liability policy only. This amount is reported in millions of dollars (\$000,000 omitted).