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January 17, 2018

Mr. James Stowe  
Associate Examiner  
Market Conduct Division  
Connecticut Insurance Department  
P.O. Box 816  
Hartford, CT 06142-0816

RE: Market Conduct Examination Report dated October 12, 2017.

Please accept the following as our report and summary of actions taken to comply with the areas of concern and recommendations raised by the Connecticut Insurance Department in the above referenced report.

**Producer Licensing**

We have taken additional measures to ensure that only policies with appointed producers can be issued in our policy issuance system by working with our IT department to add some automation to the process. Additional tables and fields were added for capturing producer names, license numbers, appointment, license, and expiration dates. These fields were linked to the policy issuance system. If a policy is entered where no match is found, a message is produced to the underwriter to refer the application to our marketing department for licensing verification. Marketing follows up with the agency to obtain the correct data and documentation. Most times the errors are due to nicknames used on the applications that don't match the formal name on the license. We will either issue the policy using the corrected data or marketing will appoint new producers as needed. We verify and update our system data against the CT state data listing twice a year.

**Policyholder Service- Advanced Premium Billing Notice**

The instances where policyholders were not notified in a timely manner for policy renewal were mainly due to when long holiday weekends occurred. To rectify this, we expanded the advanced billing 32 day programmed timeframe to 35 days to ensure that we provide the timely notice when long weekends occur. We also incorporated a new procedure in the running of a monthly management report which checks the invoice mail date against the due date to verify compliance with the 30 day time frame. Since the programming has been corrected, we have not found any additional errors. We will continue to run the report on a monthly basis in 2018.

I hope this addresses your concerns. Please let me know if additional information is needed.

Sincerely,

Susan M. Sullivan  
Regulatory Affairs Analyst