

STATE OF WASHINGTON

Phone: (360) 725-7000

MIKE KREIDLER  
STATE INSURANCE COMMISSIONER



OFFICE OF  
INSURANCE COMMISSIONER

In the Matter of	)	No. G 05-18
Hartford Fire Insurance Company	)	
Hartford Accident and Indemnity	)	
Company	)	
Hartford Underwriters Insurance	)	FINDINGS, CONCLUSIONS, AND
Company	)	
Sentinel Insurance Company, LTD.	)	ORDER ADOPTING REPORT
Hartford Casualty Insurance Company	)	
Hartford Insurance Company of the	)	OF
Midwest	)	
Twin City Fire Insurance Company	)	
Property and Casualty Insurance	)	MARKET CONDUCT EXAMINATION
Company of Hartford	)	
Authorized Insurers	)	

**BACKGROUND**

An examination of the market conduct of **Hartford Fire Insurance Company (CT), Hartford Accident and Indemnity Company (CT), Hartford Underwriters Insurance Company (CT), Sentinel Insurance Company, LTD. (CT), Hartford Insurance Company of the Midwest (IN), Twin City Fire Insurance Company (IN), Hartford Casualty Insurance Company (IN), and Property and Casualty Insurance Company of Hartford (IN)**, (the Companies) as of December 31, 2003, was conducted by examiners of the Washington Office of the Insurance Commissioner (OIC). The Companies each hold a Washington Certificate of Authority. They are domiciled in either Connecticut or Indiana, as indicated above. This examination was conducted in compliance with the laws and regulations of the state of Washington and in accordance with the procedures promulgated by the National Association of Insurance Commissioners and the OIC.

The examination report with the findings, instructions, and recommendations was transmitted to the Companies for comments on February 23, 2005. The Companies' response to the report is attached to this order only for the purpose of providing convenient review of the response.

Hartford Insurance Companies  
Examination of Market Conduct  
April 8, 2005

Mailing Address: P.O. Box 40255 • Olympia, WA 98504-0255  
Street Address: 5000 Capitol Blvd. • Tumwater, WA 98501



The Commissioner or a designee has considered the report, the relevant portions of the examiners' work papers, and submissions by the Companies.

Subject to the right of the Companies to demand a hearing pursuant to Chapters 48.04 and 34.05 RCW, the Commissioner adopts the following findings, conclusions, and order.

### FINDINGS

Findings in Examination Report. The Commissioner adopts as findings the findings of the examiners as contained in pages 3 through 30 of the report.

### CONCLUSIONS

It is appropriate and in accordance with law to adopt the attached examination report as the final report of the market conduct examination of **Hartford Fire Insurance Company, Hartford Accident and Indemnity Company, Hartford Underwriters Insurance Company, Sentinel Insurance Company, LTD., Hartford Insurance Company of the Midwest, Twin City Fire Insurance Company, Hartford Casualty Insurance Company, and Property and Casualty Insurance Company of Hartford**, and to order the Companies to take the actions described in the Instructions and Recommendations sections of the report. The Commissioner acknowledges that the Companies may have implemented the Instructions and Recommendations prior to the date of this order. The Instructions and Recommendations in the report are appropriate responses to the matters arising from RCWs and WACs found in the examination.

### ORDER

The market conduct examination report as filed, attached hereto as Exhibit A, and incorporated by reference, is hereby ADOPTED as the final examination report.

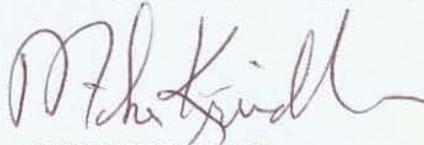
The Company is ordered as follows, these being the Instructions and Recommendations contained in the examination report on page 22.

1. The Companies are ordered to comply with RCW 48.05.190(1), Bulletin 78-7, Technical Assistance Advisory T2000-06 and ensure that the legal name of the Company is clearly identified in all correspondence, releases, and checks. (Instruction 1, Report Page 9)
2. The Companies are ordered to comply with RCW 48.17.160, and WAC 284-17-420 and ensure that all agents and agencies are appointed with each Company prior to allowing them to represent the Company. (Instruction 2, Report Page 10)
3. The Companies are ordered to comply with WAC 284-30-390, and 3901 through 3916 to ensure total losses are settled in compliance with the regulations. The Companies are further ordered to ensure all salvage bids are firm bids not estimates and are measurable, discernable, itemized and specific in value. (Instruction 3, Report Page 16)

4. It is ordered that the Companies consider conducting a training session with claims staff to specifically target Washington laws and regulations pertinent to claims handling. (Recommendation 1)

IT IS FURTHER ORDERED THAT, the Companies file with the Chief Market Conduct Examiner, within 90 days of the date of this order, a detailed report specifying how the Company has addressed each of the requirements of this order.

ENTERED at Tumwater, Washington, this 8<sup>th</sup> day of April, 2005.



MIKE KREIDLER  
Insurance Commissioner