

MIKE KREIDLER
STATE INSURANCE COMMISSIONER

STATE OF WASHINGTON



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May 22, 2008

OFFICE OF
INSURANCE COMMISSIONER

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Patricia Petersen, Chief Hearing Officer
Office of the Insurance Commissioner, Hearings Unit
PO Box 40255
Olympia, WA 98504-0255
5000 Capitol Blvd.
Tumwater, WA 98501

Hearings Unit, DIC
Patricia D. Petersen
Chief Hearing Officer

Re: Form A – Liberty Mutual Holding Company Inc. et. al. - Proposed Acquisition and Control of SAFECO Insurance Company of America, First National Insurance Company of America, General Insurance Company of America, and SAFECO Surplus Lines Insurance Company

Dear Ms. Petersen:

Attached please find the Form A Statement Regarding the Acquisition of a Domestic Insurer and associated supplementary information. The Form A relates to the proposed acquisition of control by Liberty Mutual Holding Company, Inc. et. al. ("Applicants") of SAFECO Insurance Company of America, First National Insurance Company of America, General Insurance Company of America, and SAFECO Surplus Lines Insurance Company, Washington domiciled property and casualty insurers located in Seattle, WA. The Applicants propose to acquire 100% of the existing common stock of the holding company, SAFECO Corporation ("SAFC"), of Seattle, WA. The Applicant filed the Form A with the OIC on May 16, 2008.

The Company Supervision division has not completed its review of the Form A so the Form A is not deemed complete at this time. Company Supervision anticipates the Form A review process may take approximately three months depending upon work performed by outside contractors and OIC staff. Mr. Charles Brown is the OIC staff attorney assigned to this case. If you have any questions, please call me at 360-725-7211 or Mr. Brown 360-725-7044.

Sincerely,


RONALD J. PASTUCH, CPA
Holding Company Manager
Company Supervision Division
E-Mail: RonP@oic.wa.gov

cc: James T. Odiorne, CPA, JD, Deputy Insurance Commissioner
Charles Brown, Staff Attorney

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