

# Renewing “TRIA” in 2020:

*What Should and Can Be Done Right Now?*

**Ronald R. Robinson**

*Berkes Crane Robinson & Seal LLP*

515 Figueroa Street, Suite 1500  
Los Angeles, California 90071  
(213) 955-1150  
[rrobinson@bcrslaw.com](mailto:rrobinson@bcrslaw.com)

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RONALD R. ROBINSON, co-founder, Executive Partner, Berkes Crane Robinson & Seal LLP, Los Angeles, California; a U.S. News & World Report Top Insurance Law Firm. He has served on DRI's Law Institute Committee, as Chair of its Insurance Law and Excess & Reinsurance Law Committees, and, since 2004, has Chaired DRI's Subcommittee on the Terrorism Risk Insurance Act Program; receiving DRI's National Community Service Award. He is also a member of the Federation of Defense and Corporate Counsel.

The comments, observations and opinions herein are the author's own, and do not necessarily reflect the views or positions of his law firm, DRI's TRIA Subcommittee or DRI itself.

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# Renewing “TRIA” in 2020:

## *What Should and Can Be Done Right Now?*

### I. Introduction

Today’s private insurance market risk capacity, if measured by the industry’s policy surplus, is about \$600 billion. That is all the insurance industry has available to it to protect its hundreds of trillions of dollars in property and casualty loss risk. Over the past one hundred years, private insurance market capacity studies have been developed and proven to be valid, sound, objective and reliable (“Capacity Studies”). None of the existing Capacity Studies have, however, directly or definitively addressed either the scope of the impact/demand of terrorist attack losses on policy surplus, or the capacity of today’s private insurance market to assume any portion of that risk.

The three coordinated terrorist attacks in New York, Pennsylvania and Washington DC on September 11, 2001, took 3000 lives and inflicted a financial loss on our nation fairly estimated to be in the range of \$35 billion. In response to the undeniable threat of future like attacks, and after much debate, the Congress of the United States (“Congress”) created a terrorism risk insurance coverage program. It chose to create it as a partnership between private insurance markets and the federal government, to which it transferred, by federal law, an annual risk of \$100 billion in terrorist act losses; the Terrorism Risk Insurance Risk Act of 2002 (“TRIA 2002”). However, Congress acted without the benefit of a publicly published and vetted Capacity Study being available to the parties to the debate over the advisability or scope of a federally mandated terrorism risk coverage program.

TRIA 2002 was intended to be a temporary loss sharing program that would end in 2005. At that point, Congress intended to assess whether the private insurance market had the capacity to underwrite the entire risk transfer, or whether, like TRIA 2002, the private partner should continue to assume some to be determined minority share or that risk. TRIA 2002 was amended and renewed for short terms in 2005, 2007 and 2015; the last version ends on December 31, 2020.

Each new iteration of TRIA 2002 has seen the private insurance market’s risk share increase and the government’s share decrease. Logically, any increase in the private insurance market risk share should have been premised on and validated by a publicly published and vetted objective assessment of its capacity for assuming terrorist loss risk (herein a “Terrorism Risk Capacity Study”). However, as in its first incarnation, every amendment of TRIA 2002 was passed without the benefit of a Terrorism Risk Capacity Study. Instead, each succeeding terrorism risk transfer debate continued to be grounded in political doctrine/rhetoric, and was not an analytical data driven exercise.

The issue of private insurance market terrorism risk share capacity is critical to any revised iteration of TRIA 2002 in 2020. Today, in the absence even yet of a Terrorism Risk Capacity Study, there is no reliable way to prove, let alone estimate, that the current politically derived private share of risk in the 2015 iteration of TRIA 2002 is *not a threat to the solvency of the industry’s policy surplus*, should there be a catastrophic terrorist attack. Therefore, logically what should and can be done right now, in 2018, before the outset of the renewal debate in 2020, is to begin the process that will assure that there is a Terrorism Risk Capacity Study available to Congress by the end of 2019. There is no responsible alternative.

That being said, terrorist events are uniformly intentional and politically motivated acts of violence; *i.e.*, they are not accidents. They are, instead, planned and designed to inflict damage or injury, including death, on a particular nation’s people, their property, and/or their economic and political infrastructure. The only goal of such acts is to coerce that nation’s civilian population to alter its public/foreign policy and politi-

cal agendas. Therefore, unlike other catastrophe risks, such as weather-related losses, wild fires, earthquakes, floods, and the like, which can themselves inflict tens of billions of dollars in losses, a terrorist attack is not a fortuitous event and, as such, the risk is not conducive to traditional loss modeling.

Nevertheless, the industry's policy surplus cannot be put at risk without some attempt to measure capacity for such losses. Can any Terrorism Risk Capacity Study fairly estimate the private market's share of an intentional politically driven loss risk that has yet to be reliably modeled? The private insurance market did not assume much of the \$100 billion risk at the outset of TRIA in 2002 and, consequently, the absence of a Terrorism Risk Capacity Study then was not the critical issue it has since become. This is true because each succeeding iteration of TRIA 2002 has increased the private market share of the risk exponentially. One way to approach this exercise now is to do what the industry did in the 1930s, when it began to underwrite products liability coverage for the very first time. The industry covered this then unknowable risk by using an economically reasonable fixed annual aggregate for all such losses. In other words, it calculated an objectively solvent risk capacity. Some variant of that exercise, or other like paradigms, could well be the starting point for a Terrorism Risk Capacity Study being available by 2019, at the start of the debate for "TRIA 2020." Even the attempt to do that is neither an easy nor a quick exercise. It must, therefore, begin now.

## **II. The Creation of TRIA 2002**

Immediately after the September 11, 2001, attacks, some called upon the United States Congress to transfer 100% of the future terrorism risk, a potential for losses that was threatening to cripple the financial stability of the US, to the federal government. They argued that terrorism losses are classically uninsurable events and that protection from these intentional, random and un-ratable politically motivated acts ought to be part and parcel of America's domestic and foreign political policy. Cast in this light, the risk should, they argued, be funded solely by the government as a measure of national defense. Others called upon Congress to transfer 100% of that risk to private insurance markets. They argued that the government's assumption of the risk was an ill-advised experiment in socialism – an anti-democratic taxpayer "bailout" for the insurance industry. They asserted that the government should never participate in, let alone take over, a matter best handled by private enterprise.

The risk transfer debate that followed was not, however, grounded in objective research that analyzed the only relevant question: Did the private insurance market have the financial capacity to accept any share of this catastrophic risk? Instead, the attempt to reconcile these two diametrically opposed positions was grounded in doctrinaire and political dogma driven rhetoric about the proper roles of government and private enterprise in a democracy. This debate produced much heat about, but little light to discern, the best solution to this problem. In point of fact there are but four solutions to this problem: (i) government funded programs paid for by taxes; (ii) insurance funded programs paid for by invested premiums; (iii) charity funded programs paid for by donations; or (iv) a partnership of government and private insurance markets, funded by taxes and premiums, that shares the risk in some rational proportion; augmented voluntarily by independent charity funded programs. TRIA 2002 is based on the last approach – a federal/private market partnership (herein, the "TRIA Paradigm").

TRIA 2002 provided coverage only for foreign based terrorist attacks, with a loss threshold of \$5 million required to "trigger" the application of that Act. In other words, a loss below that amount could not be "certified" under the statutory coverage program scheme as a TRIA covered terrorist act; hence, TRIA would not apply. Parenthetically, the Boston marathon bombing had a gross loss under \$5 million dollars and would not have "triggered" TRIA 2002, or any of the subsequent iterations of it. A given insurer whose coverage was triggered by an attack had the obligation to pay the first 7% of a loss in 2003, 10% in 2004 and 15% in

2005; this is often called a “deductible,” but here it is paid for, not by an insured, but by insurer. Thereafter, the insurer paid 10% of the loss and the federal government paid the remaining 90% for any certified act. The statute mandated that every property and casualty policy issued had to offer “TRIA Coverage” at a fair premium set by the individual carriers that offered it. Purchase of this cover was not mandatory. That feature remains in subsequent iterations. There was, however, no Terrorism Risk Capacity Study undertaken to support the afore-said 2002 allocation of risk. It was a political risk transfer decision, unfettered by any analytically based risk capacity logic.

### **III. The Evolution of the TRIA Paradigm Has Exponentially Increased the Private Insurance Market Share of the Risk.**

TRIA 2002 was set to expire in 2005, when Congress renewed it for two more years. It was retitled the Terrorism Risk Insurance Extension Act of 2005 (“TRIEA 2005”); which was then set to expire in 2007. In TRIEA 2005, the federal participation “trigger” was \$50 million through 2006 and \$100 million through 2007. An insurer whose coverage was triggered had the “deductible” obligation to pay the first 17.5% of a loss in 2002 and 20% in 2007. Thereafter, the insurer paid 10% of the loss through 2006 and 15% of the loss through 2007, while the federal government paid the remaining 90%/85% respectively. There was no Terrorism Risk Capacity Study undertaken to support the 2005 allocation of risk.

TRIEA 2005 was followed by the Terrorism Risk Insurance Program Reauthorization Act Of 2007 (“TRIPRA 2007”); which added coverage for domestic terrorism. It was then set to expire at the end of 2014. In TRIPRA 2007, the federal backstop “trigger” remained at \$100 million. An insurer whose coverage was triggered had the obligation to pay the first 20% in losses. Thereafter, the insurer paid 15% of the loss and the federal government paid 85%. Again, there was no Terrorism Risk Capacity Study undertaken to support the 2007 allocation of risk.

Congress considered significantly rewriting portions of TRIPRA 2007 during 2014, as it debated renewal of the TRIA Paradigm, yet again. It was an election year, and political doctrine and rhetoric, not a Terrorism Risk Capacity Study, drove the private insurance market share increase debate. A serious attempt to end or gut TRIA by making participation by insurers voluntary was also mounted, but failed. However, the rancor that defined this acrimonious exercise resulted in an unprecedented lapse of the TRIA Paradigm for twelve (12) days. TRIPRA 2007 ended on December 31, 2014, and its replacement, titled the Terrorism Risk Insurance Program Reauthorization Act of 2015 (“TRIPRA 2015”), was not enacted until January 12, 2015. It is a five-year program that expires on December 31, 2020. In TRIPRA 2015, the federal backstop “trigger” starts at \$100 million, but increases yearly in \$20 million increments to \$200 million in 2020. Opponents of the act argued, without the benefit of a Terrorism Risk Capacity Study, that the \$200 million threshold be the starting point of the new term. An insurer whose coverage is triggered has a “deductible” obligation to pay the first 20% in losses. Thereafter, beginning in 2016, the insurer pays 16% of the loss and that share increases yearly in 1% increments to 20% in 2020. The federal government pays an inverse yearly share to equal 100% of the loss in 2020; *i.e.*, one ending at 80%. Opponents argued for an immediate private share of the risk of 20% at the outset. Again, there was no Terrorism Risk Capacity Study undertaken to support the 2020 allocation of risk.

It is in the context of the above history, that the participants in the 2020 renewal debate will once again consider the fate of the TRIA Paradigm. The traditional debate stakeholders include all sectors of US national and international: financial markets; real estate markets; academia; the leisure time markets, the insurance and reinsurance markets; insurance brokers; policyholder and insurance underlying and coverage

counsel; etc. Added to that list are Congress, the Treasury Department, the Department of Homeland Security, the State Department, and other offices in the Executive Branch (herein collectively, the “Stakeholders”).

Realistically, none of the Stakeholders have an appetite in 2018 for (or, frankly, an interest in) the renewal of TRIA Paradigm in 2020. The conventional wisdom is that it is premature to think about reauthorization now. However, at this juncture, no one has stepped up to the plate to undertake a Terrorism Risk Capacity Study. There is a lot to do and not much time to do it. That is why the conventional wisdom, that it is premature to think about reauthorization of TRIPRA 2015 today, while undeniably conventional, is not necessarily wise.

#### **IV. The Marketplace Data Collection Studies Currently Mandated by TRIPRA 2015 Have Undeniable Value, But Are Not a Substitute for the Requisite Broader and More Comprehensive Terrorism Risk Capacity Study**

TRIPRA 2015 required Treasury to collect certain insurance market place data in 2016, 2017, which it did, and annually thereafter, which is to be available to the Stakeholders in the 2020 debate over the extension of that act. The National Association of Insurance Commissioners (“NAIC”) has engaged in separate data collection exercises in 2016 and 2017. For 2018, Treasury and NAIC have partnered to develop a consolidated collection approach that makes only one “data call,” at least as regards the information gathering responsibility under TRIPRA 2015.

The “data calls” typically collect the following information: (i) policy surplus; (ii) identification of policies actually issued for all TRIPRA 2015 approved insurance lines; (iii) direct earned premium, sorted by specified regions of the country; and (iv) the amount of standalone terrorism insurance being issued nationwide (coverage not imbedded in a general property or casualty policy). There are separate “data calls” for direct earned premium for: (i) standalone “cyber risk” casualty policies; and (ii) for “cyber risk” casualty coverage sections/grants incorporated into a standard commercial general liability policy.

The “data calls” also request assessments by carriers of the potential for terrorist act claims, sorted by specified regions of the country, together with an identification of the policies at risk by the standard Insurance Policy Identification Codes (*i.e.*, the type of coverage risk, for example utilities, construction, agriculture, arts and entertainment, etc.). Like information concerning the reinsurance market is to be also collected.

Treasury is also required under TRIPRA 2015 to identify competitive challenges that the small insurers face in the national and international insurance industry. For calendar year 2018, Treasury has developed relevant data collection templates organized by the nature and size of a particular insured’s operations to satisfy this requirement as well. Attached hereto as Exhibit A are Treasury’s 2018 Data Call Instructions; to be followed by all participants. The Instructions require separate reporting for insurer (non-small) groups or companies, small companies, captives and alien companies. Attached to the paper as Exhibit B is the data collection template for insurer (non-small groups or companies), small insurers, captive insurers and alien surplus lines companies. Treasury is also conducting a separate annual study of small insurer competitiveness in the market and is issuing annual reports on that issue.

However, while clearly relevant to the Terrorism Risk Capacity Study proposed in this paper, the “data calls” outlined above are neither the focus of, nor the end-point for, such a Study. That said, it is clear, based on the rationale underlying the segmentation of the “data calls” by market region and participant size, etc., that any valid Terrorism Risk Capacity Study undertaken will have to consider the differences in insurer capacity region-by-region, company-by-company, and books of business, line-by-line, to fairly capture the



“industry’s terrorism risk capacity.” Consequently, these templates would be a good place to start the construction of a meaningful and rational Terrorism Risk Capacity Study.

There is currently no premium charged insurers for their participation in the program. Instead, up until 2015, if the program losses did not exceed \$27.5 billion, Treasury could recoup 133% of any government outlays through a surcharge on commercial property and casualty policies. Once the program losses were in excess of \$27.5 billion, Treasury could recoup a lesser amount of the outlays. There are formulas which specify the reduced amount in that situation or provide some discretion to recover it all depending on how high the loss is. At the end of TRIPRA 2015, if the program losses did not exceed \$37.5 billion, the mandatory recoupment is 140% of the federal payments. One can assume that this surcharge loss calculation threshold and the recoupment percentage will also be argued to be too low by opponents of the TRIA Paradigm and, consequently, this issue too will have to be factored into any meaningful and rational Terrorism Risk Capacity Study.

Parenthetically, there is going to be a Government Accountability Office (GAO) study based on the view that, under TRIPRA 2015, the federal government has provided a reinsurance program above the \$200 million loss trigger. The study will assess the possible effects of instituting the following measures: (i) premiums for coverage under the next iteration of the TRIA Paradigm, to be paid by insurers in order to participate in the program; and (ii) requiring insurers to carry capital reserve funds for terrorism losses, just as they would in a normal reinsurance situation. Again, while clearly relevant to the Terrorism Risk Capacity Study proposed in this paper, the study by the GAO by itself is neither the focus of, nor the end-point for, such a Study. However, the issues explored in such a GAO study, or even the prospect of such a GEO study, will have to be factored into the creation of any meaningful and rational Terrorism Risk Capacity Study.

## **V. A Proposed Venue to Facilitate the Authorization and Creation of a Viable Terrorist Risk Capacity Study**

Among other things, The Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) created a new administrative office in the Treasury Department - the Federal Insurance Office (“FIO”). FIO’s authority extends to all lines of insurance, except health insurance, long-term care insurance (except that which is included with life or annuity insurance components), and crop insurance. Part of FIO’s portfolio is the administration of the current and future iterations of the TRIA Paradigm, including:

- Monitoring all aspects of the insurance industry, including identifying issues or gaps in the regulation of insurers that could contribute to a systemic crisis in the insurance industry or the U.S. financial system; and
- Assisting the Secretary in administering the various iterations of the Terrorism Risk Insurance Program, including providing guidance to address, on an interim basis, certain aspects relating to the implementation of the Program.

There is also a Federal Advisory Committee on Insurance (“FACI”) that provides advice and recommendations to assist FIO in carrying out its statutory authority. FACI was established via charter under the Federal Advisory Committee Act and its membership consists of representatives of the insurance and reinsurance community, academics, and state regulators. Members serve three-year terms. FACI provides its advice and recommendations directly to the FIO. FACI must, however, conduct its work in coordination with the FIO.

Logically, FACI’s scope of operations could include recommending and facilitating the creation of a Terrorism Risk Capacity Study by FIO because FIO’s Charter, on its face, mandates that it:

- Monitor an important aspect of the insurance industry's role in the TRIA partnership; *i.e.*, the private insurance market's terrorism risk transfer capacity. The Study be in furtherance of FIO's mandate to identify issues relevant to future risk share decisions and requirements in the regulation of insurers under the statutory TRIA Paradigm that, if mismanaged, could contribute to a systemic crisis in the insurance industry or the U.S. financial system; and
- Assist Treasury in the administration of the Terrorism Risk Insurance Program, which logically includes providing guidance to address, on an interim basis, certain aspects relating to the implementation of the allocation of risk to the private insurance markets which is the core of the TRIA paradigm.

FACI's members are well qualified to manage and to assure the issuance of a non-partisan/objective Terrorism Risk Capacity Study. However, FACI's annual budget is less than \$200,000.00, plus whatever costs are incurred by members to attend the quarterly meeting schedule envisioned by the Federal Advisory Committee Act. Moreover, it can only advise Treasury. FACI can, however, recommend to FIO: (i) that FIO undertake the financial burden for the Study; and (ii) that FACI itself be empowered by FIO with absolute and unfettered control of the content of a Terrorism Risk Capacity Study to assure its neutrality and its acceptability to all Stakeholders. However, this proposal must be initiated and successfully completed in 2018, in order to assure the Stakeholders of a valid, sound, objective and reliable Terrorism Risk Capacity Study by the end of 2019.

## **VI. Should TRIPRA 2015 be Extended in 2020 at All. Why Not End It Then and Transfer the Entire Risk to the Private Insurance Market?**

This question has been raised in every TRIA Paradigm debate to date and it will be again in 2020. The answer is to be found in the Doctrine of Loss Control ("Loss Control"). Loss Control is a fundamental and underlying tenant of the sound and solvent assumption of a transfer of any variety of risk. Broadly speaking, insurer risk reduction experts have refined the efficacy and robustness of Loss Control by literally or figuratively "walking the insured's plant" to determine whether and how to alter physical facilities and/or operations practices to lessen risk and, hopefully, prevent loss.

In the historic property and casualty risk transfer paradigm, insurers demand that Loss Control measures be implemented to reduce the incidents of claims. For tens of decades, insurers have provided guidance to their insureds on how to best reduce losses. In turn premium rates are impacted by the adherence, or lack thereof, to those Loss Control measures by those insureds. In the case of terrorism risk, for example, insurer Loss Control expertise can serve to "harden" terrorist targets by improving the insured's defenses against attacks and by instituting "best security practices" to protect the insured's buildings and occupants. But the efficacy of these terrorism focused Loss Control measures, and others too numerous to detail here, are limited to lessening or preventing the property loss and bodily injury/death that attends a terrorist attack. They do not serve to stop the attack from coming, once terrorists decide on a target that fits their political agenda.

While the insurance industry is in a position determine, test and implement terrorism Loss Control mechanisms and require their insureds to adopt them, the industry is not in a position to foresee, prevent or respond to an attack itself. Terrorists attack our nation and its peoples to force us to change: (i) the foreign and domestic policies of the United States government; (ii) our secular and religious cultures; and (iii) the social ethos of our nation's public life, as represented to the world in our media, and the rhetoric of our political and societal/cultural leaders. The United States government is the only partner in the TRIA Paradigm which

can practice Loss Control against the conduct of terrorists themselves. Only it can “walk the global plant” to reduce loss by preventing catastrophic terrorist attacks, originated in the US or abroad. Only the government has the resources to: 1) access to the information required to identify the risk; 2) directly protect the security of the nation; and 3) to stop or redress an attack. It does this by gathering intelligence, by disrupting the communications and the financial mechanisms of terrorists, and by direct military or law enforcement intervention/action to lessen or and neutralize the terrorist threat permanently.

Both parties to the TRIA Paradigm are well-suited to their unique “Loss Control” roles. Neither party is equipped to undertake the full scope of these responsibilities alone. The obvious conclusion is that a partnership is required. The TRIA Paradigm, based on a valid, objective, and universally respected Terrorism Risk Capacity Study, best covers this risk.

Moreover, for both parties to be serious about their roles, both have to have “skin in the game.” That’s really what the TRIA Paradigm is supposed to be; two partners, who both have skin in the game, *sharing terrorism risk in a rational and empirically based manner*. There is no empirical basis to argue that the partnership is not required, there is only dogma, doctrine and heated political rhetoric.

If advocates of a 100% share of the risk being placed in the private market are serious, they also must support turning over control of our intelligence operations, our law enforcement infrastructure, our armed forces and our foreign policy decisions to insurance companies and allow them to practice Loss Control at will. Absent that, the republic needs the TRIA Paradigm.

## **VII. The Only Available Alternative to a Terrorism Risk Capacity Study Based Debate over the Reauthorization of TRIPRA 2015 Is Unacceptable**

When the core debate of government vs. private insurance market unilateral assumption and/or sharing of the terrorism risk is argued again in 2020, the nation would be better served if the question is addressed based on empirical marketplace data. The only available alternative is an exercise in political dogma and rhetoric. That alternative is not grounded in finding actual factual answers to the three relevant questions: Is there sufficient market policy surplus to assume all or a portion of terrorism risk; Can terrorism risk market premium be fully and accurately rated; and Is there a viable, sustainable, effective and complete “terrorism Loss Control program” in place, by both the government and private insurance markets, to minimize the risk? A rational and logical debate on the TRIA Paradigm can only proceed based on a Terrorism Risk Capacity Study.

As noted above, the compromise bill that became TRIPRA 2015 languished in a legislative limbo until January 12, 2015, when it was finally signed into law in opening weeks of the 114<sup>th</sup> Congress. The Stakeholders reacted calmly during the month of uncertainty that followed the mid-December collapse of the renewal of TRIPRA 2007. All the Stakeholders prepared for the worst, while trusting that the final bill approved by the Conference Committee would be enacted shortly. It was.

However, consider what would have happened if TRIPRA 2007 had lapsed for many months, if not longer, or had not renewed at all. That circumstance can be fairly envisioned as resulting in chaos in the national economy, if not the world economy. A significant, if not devastating, and far reaching financial disaster would have soon been visited upon all the Stakeholders. More to the point, one can logically argue that the absence of TRIPRA 2015 after 2020 would embolden terrorists to time a catastrophic terrorist attack following its termination.

## VIII. Conclusion

TRIPRA 2015's renewal is a very controversial political question, which must be answered yet again in 2020, one way or the other. That year will already have seen the results of the 2018 Congressional election; one that many believe will be divisive and caustic because it could yield a democratically controlled House and a Senate where neither party has full control of every issue. More importantly, in 2020, we will be in the midst of a presidential election that will not be resolved until November of that year. There may well be a new administration of either party that comes to power before the new bill is voted on. If the polarizing tenor of the process that yielded TRIPRA 2015 is any indicator, proponents of the TRIA Paradigm will their work cut out for them in the expected political context of 2020.

If the expected debate is to be grounded in a quest for common ground on an empirically revised TRIA Paradigm risk allocation formula, there has to be a Terrorism Risk Capacity Study available to all Stakeholders. The gathering of these facts is what must start now. That process, wherever it leads, is the right prologue to assure that whatever follows TRIPRA 2015 is economically sound. That process would be served best if it is consistent with the core tenant of a secure democracy: a majority rule government of the people, by the people, and for the people, that respects the minority view and does as much as possible to listen to and honor the loyal opposition in the majority's quest for truly common ground. We seem to have trouble honoring that tenant today. A Terrorism Risk Capacity Study is a step in the right direction to address that problem.

If this step is not taken, a paraphrase of a very oft cited quote from Shakespeare's Julius Cesare serves well as a "Final Word." *"the fault dear friends lies not in our Congress, but in ourselves."*

# **What Should and Can be Done Right Now?**

## **Exhibit A**

**Copy of Instructions for the Reporting Template:  
2018 Combined Treasury and NIAC TRIPRA Data Call  
For (Non Small) Insurance Groups or Companies**



## Instructions for Terrorism Risk Insurance Program (TRIP) 2018 Data Call Insurer (Non-Small) Groups or Companies

### Form Overview

This reporting form is for insurers that are not classified as *Small Insurers*, *Captive Insurers*, or *Alien Surplus Lines Insurers*.

- Insurance groups or entities are exempt from reporting if they had less than \$10 million in TRIP-eligible DEP in 2017.
- If the insurance group or entity had both a policyholder surplus and TRIP-eligible direct earned premium (DEP) of less than \$700 million (each) in 2016, the insurer should complete the *Small Insurers* template.
- If either a Captive Insurer or an Alien Surplus Lines Insurer is affiliated with a group, the experience of that insurer should be reported with that group on either this template or the *Small Insurers* template, based upon the size category.
- If the Captive Insurer or Alien Surplus Lines Insurer is not affiliated with a group, it should complete the *Alien Surplus Lines Insurers* or *Captive Insurers* template as appropriate.

### General Guidelines

- All information should be reported on a consolidated insurer group basis, unless reporting for a single insurer.
- When providing premium on a jurisdictional basis, premium should be allocated in the same fashion that it is for state reporting and premium tax purposes. Accordingly, coverage written on a non-admitted, surplus lines basis may be allocated in full to the home state of the policyholder, as defined by the Nonadmitted and Reinsurance Reform Act.
  - **Note:** This allocation method should not be applied on the Geographic Exposures worksheet, which seeks information based upon the location of the exposure, regardless of the manner in which the premium may have been allocated.
- When providing premium on a jurisdictional basis, for premium which is otherwise not allocable to a particular jurisdiction (e.g., certain Ocean Marine coverages, or coverages based upon foreign operations with a U.S. nexus), report this premium only for the United States as a whole.
- DEP should be included in this calculation to the extent that commercial property and casualty coverage is issued for losses occurring at the following locations: (1) Within the United States; (2) With respect to an air carrier (as defined in section 40102 of title 49, United States Code), or a United States flag vessel (or a vessel based principally in the United States, on which United States income tax is paid and whose insurance coverage is subject to regulation in the United States); and (3) At the premises of any U.S. mission.
- TRIP-eligible lines to be included in DEP calculations generally correspond to NAIC lines (as reported on the *NAIC Exhibit of Premiums and Losses*, commonly known as Statutory Page 14). The information reported on this worksheet should only include TRIP-eligible DEP. Any amounts reported on Statutory Page 14 that are not within the scope of TRIP-eligible lines as defined by the Program regulations should not be reported here [see 31 CFR 50.4(w)]. Specifically:

OMB No. 1505-0257

Expiration: \_\_\_\_\_



- The property line Allied Lines (NAIC Line 2.1) should not include federal crop insurance or any other type of crop insurance privately issued or reinsured.
- Workers' Compensation (NAIC Line 16) data will be reported on the insurer's behalf by NCCI and/or the California WCIRB. However, you must still report excess workers' compensation premium (identified as sub-type of insurance 16.003 on the NAIC's Uniform Property & Casualty Product Coding Matrix and otherwise reported under 17.3 as indicated).
- The liability line of Other Liability (NAIC Line 17) should not include Professional Errors and Omissions Liability Insurance [see 31 CFR 50.4(t)] or Excess Workers' Compensation Premium (which is entered separately as noted above).
- For purposes of this data collection, reporting insurers do not need to make the premium adjustments in connection with residual market mechanisms provided for under 31 CFR 50.33.
- Policy count should be calculated based on the number of policies incepting in 2017 (or in effect for the entire year). For reporting other elements apart from DEP, where the reporting of information (e.g., exposures) under policies in effect during 2017 would result in double counting for the year as a whole, utilize a reporting date of December 31, 2017.
- Information subject to reporting under the Standalone Terrorism (Nationwide) Worksheet and Cyber (Nationwide) Worksheet should also be reported in the appropriate fields under the Policies and Direct Earned Premium (DEP) (Jurisdiction) Worksheet.
- Questions on the Reinsurance (Nationwide) Worksheet are limited to reinsurance purchased from unaffiliated third-party companies, and do not include reinsurance transactions within a group of affiliated insurers.
- Blacked out cells indicate that no data will be reportable for that particular cell.

### Summary of Changes from 2017 Templates

- Deleted Package/Multi-Line Worksheet in its entirety.
- Added Cyber Worksheet.
- Affiliations Worksheet:
  - Deleted request for net admitted assets for prior year.
  - Deleted request for TRIP-eligible direct earned premium (DEP) for current year.
  - TRIP-eligible premium for prior year (2016) will be auto-populated with figures reported during the 2017 data call.
- Policies and Direct Earned Premium by Jurisdiction Worksheet:
  - Deleted request for total terrorism risk premium over time and years covered.
  - Deleted request for TRIP-eligible DEP for prior year.
- Exposure Bases by Jurisdiction Worksheet:
  - Added columns for policyholder deductibles and self-insured retentions to property and liability questions, for both TRIP-covered and non-TRIP covered policies.
- Reinsurance (Nationwide) Worksheet:
  - Replaced modeled loss scenario.

### Summary of Changes from 2017 Instructions

- Change in Small Insurer reporting threshold based on Program Rules.
- Affiliations Worksheet:
  - Deleted instructions relating to questions concerning net admitted assets for prior year.
  - Updated instructions concerning prior year's TRIP-eligible DEP to confirm the figure will be auto-populated based on 2017 data call.
- Policies and Direct Earned Premium by Jurisdiction Worksheet:
  - Updated instructions to confirm that a separate worksheet should be included to provide total figures for the United States a whole (in addition to worksheets for each individual jurisdiction).
  - Updated instructions to clarify how data elements should be reported where counting all policies/information in effect at any time during 2017 would result in double-counting of exposure over the course of the year.
  - Deleted instructions relating to total terrorism premium over time.
  - Deleted instructions relating to prior year's TRIP-eligible DEP.
- Deleted all instructions for Package/Multi-Line Worksheet.
- Added instructions for Cyber Worksheet.
- Exposure Bases by Jurisdiction Worksheet:
  - Updated instructions to confirm that a separate worksheet should be included to provide total figures for the United States a whole (in addition to worksheets for each individual jurisdiction).
  - Added instructions for reporting of policyholder deductible and self-insured retention information.
- Geographic Exposures (Nationwide) Worksheet
  - Updated instructions to confirm that question on probable maximum loss should be answered on a gross basis of loss, without reference to private reinsurance or claims against TRIP.
  - Narrowed range of blast to be used in calculation of Maximum Probable Loss amount.
- Reinsurance (Nationwide) Worksheet:
  - Revised instructions to comport with modeled loss scenario. In addition, the instructions now specify that the total projected loss figure must equal the sum of the individual components of the loss.



### Instructions for Insurer Group Affiliations Worksheet

Insurer Group Affiliations		
Section	Field Name	Comments
B4	NAIC Group Code	<p>Provide the NAIC Group Code used for state regulatory reporting purposes.</p> <ul style="list-style-type: none"> <li>If the insurer is not part of a group, leave blank and report the individual company's NAIC Company Code in Cell B9.</li> <li>Groups that have no such number will be assigned a number by the aggregator.</li> </ul>
C4	Insurer Group Name	<p>Provide name as used by reporting insurance group.</p> <ul style="list-style-type: none"> <li>If the insurer is not part of a group, leave blank and report the individual company's name in Cell C9.</li> </ul>
B9-B27	NAIC Company Code	<p>Provide the NAIC Company Code used for state regulatory reporting purposes.</p> <ul style="list-style-type: none"> <li>Enter information for each company within an affiliated group of insurers (as reported in Cells B4 and C4), or enter information for individual company if not part of a group.</li> <li>Companies that have no such number will be assigned a number by the aggregator.</li> </ul>
C9-C27	Insurance Company Name	<p>Provide name as used by reporting insurance company.</p> <ul style="list-style-type: none"> <li>Enter information for each company within an affiliated group of insurers (as reported in Cells B4 and C4), or report for individual company if not part of a group.</li> </ul>
D9-D27	Type of Insurer	<p>Select from drop-down list the item that best describes the operations of the reporting insurer with respect to the Terrorism Risk Insurance Program (Admitted, Domestic Surplus Lines, Alien Surplus Lines, Joint Underwriting Association/Pooling Arrangement, Residual Market Entity, State Workers' Compensation Fund).</p>
H3	Total 2016 Policyholder Surplus	<p>Enter total 2016 policyholder surplus as reported by the insurance group or company for state regulatory purposes on its Annual Statement for 2016 at Page 3, Line 37, Column 1.</p> <ul style="list-style-type: none"> <li>To the extent the insurer does not report this figure for state regulatory purposes, report a policyholder surplus figure for 2016 based upon an equivalent methodology.</li> </ul>

<i>Insurer Group Affiliations</i>		
Section	Field Name	Comments
H4	Total 2016 TRIP-Eligible DEP (all lines)	<p>Provide the insurance group or company's total 2016 TRIP-Eligible Direct Earned Premium (DEP), for all lines and all jurisdictions.</p> <ul style="list-style-type: none"> <li>If the insurer reported in the 2017 TRIP Data Call, this field has already been populated with the information that was previously provided.</li> </ul>

### Instructions for Policies and Direct Earned Premium (DEP) (Jurisdiction) Worksheet

<i>Policies and Direct Earned Premium (DEP) (Jurisdiction)</i>		
Section	Field Name	Comments
B2	Jurisdiction	Provide policy and DEP information by jurisdiction (U.S. state, the District of Columbia, or U.S. territory) on separate worksheets. Complete an additional worksheet to provide policy and DEP information for the United States as a whole.
B7-B18 C7-C18	TRIP-Eligible Line of Coverage	Cells B7-B18 list the TRIP-eligible lines of coverage presently used by insurers. Cells C7-C18 list the NAIC lines (as reported on the <i>NAIC Exhibit of Premiums and Losses</i> , commonly known as Statutory Page 14) which generally correspond to these TRIP-eligible lines.
D7-D18	Total 2017 TRIP-Eligible DEP (all policies)	<p>The figures in Column D will show the total 2017 DEP charged for the corresponding TRIP-eligible line of insurance listed in Cells B7-B18. The figures reported in this column will equal the sum of the respective figures reported in Columns E-G.</p> <p>Cell D19 will show the insurance group or company's total 2017 TRIP-eligible DEP for all lines of insurance.</p>
E7-E18	Total 2017 TRIP-Eligible DEP when Terrorism Risk Coverage Not Purchased	<p>For each corresponding TRIP-eligible line of insurance listed in Cells B7-B18, provide total 2017 DEP of policies in which terrorism risk coverage was <u>not</u> provided to the policyholder.</p> <ul style="list-style-type: none"> <li>Include premium in this column only if a policy did not provide any coverage subject to TRIP.</li> <li>If the policyholder declined the initial mandatory offer, but a different amount of coverage subject to TRIP was then negotiated, include that premium information in Column F or G, as appropriate.</li> </ul>

<i>Policies and Direct Earned Premium (DEP) (Jurisdiction)</i>		
Section	Field Name	Comments
F7-F18	Total 2017 TRIP-Eligible DEP when Terrorism Risk Coverage Provided for Disclosed \$0 Charge	For each corresponding TRIP-eligible line of insurance listed in Cells B7-B18, provide total 2017 DEP of policies in which terrorism risk coverage was provided by the insurer to the policyholder for a disclosed charge of \$0.
G7-G18	Total 2017 TRIP-Eligible DEP when Terrorism Risk Coverage Premium Charged	For each corresponding TRIP-eligible line of insurance listed in Cells B7-B18, provide total DEP for 2017 of policies in which terrorism risk coverage was provided by the insurer to the policyholder for a disclosed charge of more than \$0.
H7-H18	Total 2017 Disclosed Terrorism Risk Coverage DEP Charged	For each corresponding TRIP-eligible line of insurance listed in Cells B7-B18, provide the amount of DEP charged for terrorism risk. <ul style="list-style-type: none"> <li>This figure, representing premium charged for terrorism risk, should be a component of the amount provided in Column G.</li> </ul>
I7-I18	Total 2017 Number of Policies by Line (Terrorism Risk Coverage Not Purchased)	For each corresponding TRIP-eligible line of insurance listed in Cells B7-B18, provide the number of policies included in the DEP reported in Cells E7-E18 (where terrorism risk coverage was not provided to the policyholder). <ul style="list-style-type: none"> <li>Count policies containing multiple lines of TRIP-eligible coverage as separate policies for each line.</li> </ul>
J7-J18	Total 2017 Number of Policies by line when Terrorism Risk Coverage Provided for Disclosed \$0 Charge	For each corresponding TRIP-eligible line of insurance listed in Cells B7-B18, provide the number of policies included in the DEP reported in Cells F7-F18 (where terrorism risk coverage was provided for a disclosed charge of \$0). <ul style="list-style-type: none"> <li>Count policies containing multiple lines of TRIP-eligible coverage as separate policies for each line.</li> </ul>
K7-K18	Total 2017 Number of Policies by line when Terrorism Risk Coverage Premium Charged	For each corresponding TRIP-eligible line of insurance listed in Cells B7-B18, provide the number of included in the DEP reported in Cells G7-G18 (where terrorism risk coverage was provided by the insurer for a disclosed charge of more than \$0). <ul style="list-style-type: none"> <li>Count policies containing multiple lines of TRIP-eligible coverage as separate policies for each line.</li> </ul>
L7-L18	Total 2017 Number of Policies by Line	The figures in Column L will show the total policy count for the corresponding TRIP-eligible line of insurance listed in Cells B7-B18. The figures reported in this column will equal the sum of the respective figures reported in Columns I-K.

<i>Policies and Direct Earned Premium (DEP) (Jurisdiction)</i>		
Section	Field Name	Comments
C21	Total 2017 Number of Policies Containing TRIP-Eligible Coverage	<p>Provide the total number of policies associated with the total TRIP-eligible DEP shown in Cell D19.</p> <ul style="list-style-type: none"> <li>Count policies containing multiple lines of TRIP-eligible coverage as single policies for purposes of calculating the total policy count.</li> <li>The total in Cell C21 will not be equal to the figure in Cell L19 if the insurance group or company issued any policies containing multiple lines of TRIP-eligible coverage.</li> </ul>

#### Instructions for Standalone Terrorism (Nationwide) Worksheet

<i>Standalone Terrorism (Nationwide)</i>		
Section	Field Name	Comments
C3	2017 DEP for Standalone Terrorism Policies	<p>Provide 2017 DEP for standalone terrorism policies for the United States as a whole.</p> <ul style="list-style-type: none"> <li>Enter information here if the insurance group or company issued "standalone" policies covering <u>only</u> terrorism risk.</li> <li>Include all terrorism risk policies, whether or not subject to TRIP.</li> <li>Policies that include additional non-terrorism risks should not be included in this worksheet. These should be included in the <i>Policies and DEP (Juris.) Worksheet</i>.</li> </ul>
C4	Portion of 2017 DEP for TRIP Certified Terrorism Loss Coverage	Identify the portion of the 2017 standalone terrorism DEP provided in Cell C3 which was subject to TRIP (if any).
C5	Portion of 2017 DEP for Non-Certified Terrorism Loss Coverage	Identify the portion of the 2017 standalone terrorism DEP provided in Cell C3 which was not subject to TRIP (if any).
C6	2017 Number of Standalone Terrorism Policies Issued	Provide the 2017 policy count for the DEP provided in Cell C3.
C7	2017 Number of Standalone Terrorism Policies Covering TRIP Loss Issued	Provide the 2017 policy count for the DEP provided in Cell C4.

Standalone Terrorism (Nationwide)		
Section	Field Name	Comments
C8	2017 Property Insurance Exposure for Standalone Terrorism Policies Covering TRIP Loss	<p>Provide the insurer's total 2017 property insurance exposure for all property coverage provided in connection with the amount reported in Cell C3.</p> <ul style="list-style-type: none"> <li>• Include the total amount of the reporting insurer's exposure for a property loss (and thus do not include amounts within a policyholder's deductible, etc.).</li> <li>• To the extent the value of the policyholder's property is not fully insured by the policy in question, use the limits of the property insurance to calculate the insurer's exposure.</li> </ul>
C9	2017 Total Limits of Liability for Standalone Terrorism Policies Covering TRIP Loss	<p>Provide the insurer's total 2017 liability exposure for all liability coverage provided in connection with the amount reported in Cell C3.</p> <ul style="list-style-type: none"> <li>• Include the total amount of the reporting insurer's liability exposure (and thus do not include amounts within a policyholder's deductible, etc.).</li> <li>• Use the limits of the liability insurance to calculate the insurer's exposure.</li> </ul>



### Instructions for Cyber (Nationwide) Worksheet

Cyber (Nationwide)		
Section	Field Name	Comments
C3-E3	2017 TRIP-Eligible DEP for Cyber Policies	<p>Provide 2017 TRIP-eligible DEP for cyber policies for the United States as a whole. Enter 2017 TRIP-eligible DEP for “standalone” cyber policies in Cell C3. Enter 2017 TRIP-eligible DEP for package policies containing cyber coverage as well as other risks in Cell D3.</p> <ul style="list-style-type: none"> <li>• Policies that may respond to a cyber loss but do not explicitly provide coverage for cyber risks should not be included in this worksheet.</li> <li>• Policies that provide cyber coverage outside of TRIP-eligible lines should not be included.</li> <li>• For purposes of cyber coverage provided as part of a package policy, provide the premium associated with the cyber coverage, or provide an estimate of the cyber component if the policy does not specify the cyber premium.</li> </ul> <p>Cell E3 must show the sum of the values entered in Cells C3 and D3.</p>
C4-E4	2017 TRIP-Eligible DEP for Cyber Policies Not Providing Coverage for Certified Acts of Terrorism Under TRIP	<p>Provide 2017 DEP for cyber policies in TRIP-eligible lines where terrorism risk coverage was <u>not</u> purchased by the policyholder. Enter 2017 DEP for “standalone” cyber policies in Cell C4. Enter 2017 TRIP-eligible DEP for package policies containing cyber coverage in Cell D4.</p> <p>Cell E4 must show the sum of the values entered in Cells C4 and D4.</p>
C5-E5	2017 TRIP-Eligible DEP for Cyber Policies Providing Coverage for Certified Acts of Terrorism Under TRIP	<p>Provide 2017 DEP for cyber policies in TRIP-eligible lines where terrorism risk coverage <u>was</u> purchased by the policyholder. Enter 2017 DEP for “standalone” cyber policies in Cell C5. Enter 2017 TRIP-eligible DEP for package policies containing cyber coverage in Cell D5.</p> <p>Cell E5 must show the sum of the values entered in Cells C5 and D5.</p>

Cyber (Nationwide)		
Section	Field Name	Comments
C6-E6	2017 Total Disclosed Terrorism Risk Coverage DEP Charged Under Cyber Policies	<p>Provide the amount of DEP charged for terrorism risk in cyber policies providing terrorism risk coverage. Enter 2017 DEP charged for terrorism risk in "standalone" cyber policies in Cell C6. Enter 2017 DEP charged for terrorism risk in package policies containing cyber coverage in Cell D6.</p> <ul style="list-style-type: none"> <li>• These figures, representing premium charged for terrorism risk, should be a component of the amounts provided in C5 and D5, respectively.</li> <li>• Do not include premiums charged for terrorism coverage provided that is not subject to TRIP.</li> </ul> <p>Cell E6 must show the sum of the values entered in Cells C6 and D6.</p>
C7-E7	2017 Number of Cyber Policies Issued	<p>Provide the corresponding 2017 policy count for the DEP provided in Cells C3-D3.</p> <p>Cell E7 must show the sum of the values entered in Cells C7 and D7.</p>
C8-E8	2017 Number of Cyber Policies Covering TRIP Loss Issued	<p>Provide the corresponding 2017 policy count for the DEP provided in Cells C5-D5.</p> <p>Cell E8 must show the sum of the values entered in Cells C8 and D8.</p>
C9-E9	2017 Total Liability Policy Limits for Cyber Policies Covering TRIP Loss	<p>Provide the insurer's total 2017 liability exposure for all cyber liability coverage provided in connection with the corresponding amounts reported in Cells C5 and D5.</p> <ul style="list-style-type: none"> <li>• Include the total amount of the reporting insurer's liability exposure (and thus do not include amounts within a policyholder's deductible, etc.).</li> <li>• Use the limits of the liability insurance to calculate the insurer's exposure.</li> <li>• For cyber coverage provided as part of a package policy, provide the limits associated with the cyber coverage provided.</li> </ul>

### Instructions for Exposure Bases by Jurisdiction Worksheet

<i>Exposure Bases by Jurisdiction</i>		
Section	Field Name	Comments
B2	Jurisdiction	Provide information by jurisdiction (U.S. state, the District of Columbia, or U.S. territory) on separate worksheets. Complete an additional worksheet to provide information for the United States as a whole.
B6-B17 C6-C17	TRIP-Eligible Line of Coverage	Cells B6-B17 list the TRIP-eligible lines of coverage presently used by insurers. Cells C6-C17 list the NAIC lines (as reported on the <i>NAIC Exhibit of Premiums and Losses</i> , commonly known as Statutory Page 14) which generally correspond to these TRIP-eligible lines.
D6-D17	Total 2017 Property Insurance Exposure Subject to Terrorism Risk Coverage	<p>For each corresponding TRIP-eligible line of insurance listed in Cells B6-B17, provide total property exposure under all 2017 policies where terrorism risk coverage was provided in connection with property coverage.</p> <ul style="list-style-type: none"> <li>• Enter the amount for each jurisdiction (based on the exposure as allocated for premium purposes) individually, even if an aggregate limit may limit exposure across multiple jurisdictions. In the response for the United States as a whole, report the total aggregate limit exposure only.</li> <li>• Include the total amount of the reporting insurer's property exposure (and thus do not include amounts within a policyholder's deductible, etc.).</li> <li>• Use the limits of the property insurance to calculate the insurer's exposure.</li> <li>• If the policy has an aggregate limit, use the aggregate limit.</li> <li>• If the policy is subject to a per occurrence limit and not an aggregate limit, use the single occurrence limit.</li> <li>• To the extent the policy exposure is based upon property values or annual sales and is not otherwise subject to a policy limit, use the property values or annual sales figures.</li> </ul>
E6-E17	Total 2017 Policyholder Deductibles under 2017 Property Insurance Exposure Subject to Terrorism Risk Coverage	<p>For each corresponding TRIP-eligible line of insurance listed in Cells B6-B17, provide total deductible or retention exposure retained by your policyholders under the policies reported in Cells D6-D17.</p> <ul style="list-style-type: none"> <li>• Do not include amounts of underlying insurance covered by other insurance policies.</li> </ul>



<i>Exposure Bases by Jurisdiction</i>		
Section	Field Name	Comments
F6-F17	Total 2017 Property Insurance Exposure Not Subject to Terrorism Risk Coverage	<p>For each corresponding TRIP-eligible line of insurance listed in Cells B6-B17, provide total 2017 property insurance exposure in which terrorism risk coverage was <u>not</u> obtained by the policyholder.</p> <ul style="list-style-type: none"> <li>• Include exposure amounts in this column only if a policy did not provide any coverage subject to TRIP.</li> </ul>
G6-G17	Total 2017 Policyholder Deductibles under 2017 Property Insurance Exposure Not Subject to Terrorism Risk Coverage	<p>For each corresponding TRIP-eligible line of insurance listed in Cells B6-B17, provide total deductible or retention exposure retained by your policyholders under the policies reported in Cells F6-F17.</p> <ul style="list-style-type: none"> <li>• Do not include amounts of underlying insurance covered by other insurance policies.</li> </ul>
H6-H17	Total 2017 Limits of Liability Subject to Terrorism Risk Coverage	<p>For each corresponding TRIP-eligible line of insurance listed in Cells B6-B17, provide total limits of liability under all 2017 policies where terrorism risk coverage was provided in connection with liability coverage.</p> <ul style="list-style-type: none"> <li>• Enter the amount for each jurisdiction (based on the exposure as allocated for premium purposes) individually, even if an aggregate limit may limit exposure across multiple jurisdictions. In the response for the United States as a whole, report the total aggregate limit exposure only.</li> <li>• Include the total amount of the reporting insurer's liability exposure (and thus do not include amounts within a policyholder's deductible, etc.).</li> <li>• Use the limits of the liability insurance to calculate the insurer's exposure.</li> <li>• If the policy has an aggregate limit, use the aggregate limit.</li> <li>• If the policy is subject to a per occurrence limit and not an aggregate limit, use the single occurrence limit.</li> </ul>
I6-I17	Total 2017 Policyholder Deductibles under 2017 Limits of Liability Subject to Terrorism Risk Coverage	<p>For each corresponding TRIP-eligible line of insurance listed in Cells B6-B17, provide total deductible or retention exposure retained by your policyholders under the policies reported in Cells H6-H17.</p> <ul style="list-style-type: none"> <li>• Do not include amounts of underlying insurance covered by other insurance policies.</li> </ul>

<i>Exposure Bases by Jurisdiction</i>		
Section	Field Name	Comments
J6-J17	Total 2017 Limits of Liability Not Subject to Terrorism Risk Coverage	<p>For each corresponding TRIP-eligible line of insurance listed in Cells B6-B17, provide total 2017 limits of liability in which terrorism risk coverage was <u>not</u> obtained by the policyholder.</p> <ul style="list-style-type: none"> <li>• Include exposure amounts in this column only if a policy did not provide any coverage subject to TRIP.</li> </ul>
K6-K17	Total 2017 Policyholder Deductibles under 2017 Limits of Liability Not Subject to Terrorism Risk Coverage	<p>For each corresponding TRIP-eligible line of insurance listed in Cells B6-B17, provide total deductible or retention exposure retained by your policyholders under the policies reported in Cells J6-J17.</p> <ul style="list-style-type: none"> <li>• Do not include amounts of underlying insurance covered by other insurance policies.</li> </ul>
L6-L17	Total 2017 Payroll Subject to Terrorism Risk Coverage	<p>Provide total 2017 payroll for excess workers' compensation under all policies in Cell L13.</p> <ul style="list-style-type: none"> <li>• Completion of Cell L12 (total 2017 payroll for workers' compensation) is not required. This information will be provided on the insurer's behalf by NCCL and/or the California WCIRB.</li> </ul>

### Instructions for Policyholder Industry Code (Nationwide) Worksheet

Policyholder Industry Code (Nationwide)		
Section	Field Name	Comments
C4-C24 D4-D24	NAICS Code	<p>Reporting insurers should categorize information under (1) NAICS Codes, (2) SIC Codes, or (3) Other to allocate premium on this worksheet.</p> <ul style="list-style-type: none"> <li>Cells C4-C24 and D4-D24 list the North American Industrial Classification System (NAICS) industry code numbers and descriptions.</li> <li>Cells C25-C35 and D25-D35 list the Standard Industrial Classification System (SIC) industry code numbers and description.</li> <li>If insurer does not use NAICS or SIC codes, the applicable industry code information should be entered into Cells C36-C43 and D36-D43.</li> <li>Insurers may enter individual ISO class codes and descriptions into Cells C36-C43 and D36-D43 (Other) to allocate premium. Insert rows as needed to allow for additional entries.</li> <li>If an industry code is unavailable for a policy, include that policy in the total for Row 24 (NAICS), Row 35 (SIC), or the last row of "Other."</li> <li>The total TRIP-eligible DEP appearing in Cell H44 should match the value appearing in Cell D19 on the <i>Policies and Direct Earned Premium by Jurisdiction</i> Worksheet.</li> </ul>
C25-C35 D25-D35	SIC Code	
C36-C43 D36-D43	Other	
E4-E24 E25-E35 E36-E43	Total 2017 Disclosed Terrorism Risk Coverage DEP Charged (Property)	<p>Allocate (by industry code) the amount of 2017 DEP charged for terrorism risk under property policies.</p> <ul style="list-style-type: none"> <li>These figures, representing premium charged for terrorism risk, should be a component of the amounts provided in Column G.</li> </ul>
F4-F24 F25-F35 F36-F43	Total 2017 TRIP-Eligible DEP When Terrorism Risk Coverage Not Purchased (Property)	<p>Allocate (by industry code) the amount of total 2017 DEP of property policies in which terrorism risk coverage was <u>not</u> provided to the policyholder.</p>
G4-G24 G25-G35 G36-G43	Total 2017 TRIP-Eligible DEP When Terrorism Risk Coverage Purchased (Property)	<p>Allocate (by industry code) the amount of total 2017 DEP of property policies in which terrorism risk coverage <u>was</u> obtained by the policyholder.</p> <ul style="list-style-type: none"> <li>Include policies where terrorism risk coverage was provided at no charge.</li> </ul>

Policyholder Industry Code (Nationwide)		
Section	Field Name	Comments
I4-I24 I25-I35 I36-I43	Total 2017 Disclosed Terrorism Risk Coverage DEP Charged (Liability)	Allocate (by industry code) the amount of 2017 DEP charged for terrorism risk under liability policies. <ul style="list-style-type: none"> <li>These figures, representing premium charged for terrorism risk, should be a component of the amounts provided in Column K.</li> </ul>
J4-J24 J25-J35 J36-J43	Total 2017 TRIP-Eligible DEP When Terrorism Risk Coverage Not Purchased (Liability)	Allocate (by industry code) the amount of total 2017 DEP of liability policies in which terrorism risk coverage was <u>not</u> provided to the policyholder.
K4-K24 K25-K35 K36-K43	Total 2017 TRIP-Eligible DEP When Terrorism Risk Coverage Purchased (Liability)	Allocate (by industry code) the amount of total 2017 DEP of liability policies in which terrorism risk coverage <u>was</u> obtained by the policyholder. <ul style="list-style-type: none"> <li>Include policies where terrorism risk coverage was provided at no charge.</li> </ul>
M4-M24 M25-M35 M36-M43	Total 2016 Disclosed Terrorism Risk Coverage DEP Charged (Workers' Compensation)	No entry required. This information will be reported on the insurer's behalf by NCCI and/or California WCIRB. <ul style="list-style-type: none"> <li>Do not report information in these cells, even if the insurer issues Excess Workers' Compensation insurance.</li> </ul>
N4-N24 N25-N35 N36-N43	Total 2017 TRIP-Eligible DEP (Workers' Compensation)	No entry required. This information will be reported on the insurer's behalf by NCCI and/or California WCIRB. <ul style="list-style-type: none"> <li>Do not report information in these cells, even if the insurer issues Excess Workers' Compensation insurance.</li> </ul>

### Instructions for Geographic Exposures (Nationwide) Worksheet

<i>Geographic Exposures (Nationwide)</i>		
Section	Field Name	Comments
B3-B30	Region	<p>This field shows the specified metropolitan regions of the United States (Cells B3-B28) for which exposure information should be recorded.</p> <ul style="list-style-type: none"> <li>• Locations not listed in the identified metropolitan areas (including territories) should be listed in Row 29.</li> <li>• Policies for which location information is not available should be recorded in Row 30.</li> <li>• Although information is sought on other worksheets by where the premium is allocated for state reporting and tax purposes, the information sought in this sheet should be reported based upon where the property and workers' compensation exposures are actually located.</li> </ul>
C3-C30	Description	<p>This field outlines locations (by ZIP code) in the metropolitan regions listed in Cells B3-B28.</p> <ul style="list-style-type: none"> <li>• The descriptions are based upon definitions currently in use by private rating agencies.</li> <li>• To the extent the insurance group or company does not track its data in this fashion, report the information by the closest approximation of the U.S. county and city jurisdictions involved.</li> </ul>
D3-D30	Total 2017 Payroll Subject to TRIP Coverage under Primary WC Coverage	No entry required. This information will be reported on the insurer's behalf by NCCI and/or California WCIRB.
E3-E30	Total 2017 Payroll Subject to TRIP Coverage under Excess WC Coverage	For each corresponding region listed in Cells B3-B30, provide 2017 payroll figures included under policyholders' excess workers' compensation coverage.
F3-F30	Total 2017 Property Insurance Exposure Subject to TRIP Property Coverage	<p>For each corresponding region listed in Cells B3-B30, provide the insurer's 2017 property exposure for all property coverage.</p> <ul style="list-style-type: none"> <li>• Include the total amount of the reporting insurer's policy exposure (and thus do not include amounts within a policyholder's deductible, etc.).</li> <li>• To the extent the value of the policyholder's property is not fully insured by the policy in question, use the limits of the property insurance to calculate the insurer's exposure.</li> </ul>



<i>Geographic Exposures (Nationwide)</i>		
Section	Field Name	Comments
G3-G30	Total 2017 Property Insurance Exposure Not Subject to TRIP Property Coverage	For each corresponding region listed in Cells B3-B30, provide the insurer's 2017 property exposure not subject to TRIP property coverage.
C35-C39	ZIP Code of Top 5 Largest Accumulated Exposure Locations by Payroll (Metropolitan Areas)	<ul style="list-style-type: none"> <li>No entry required. This information will be reported on the insurer's behalf by NCCI and/or California WCIRB.</li> </ul>
D35-D39	Amount of Top 5 Largest Accumulated Exposure Locations by Payroll (Metropolitan Areas)	No entry required. This information will be reported on the insurer's behalf by NCCI and/or California WCIRB.
E35-E39	ZIP Code of Top 5 Largest Accumulated Exposure Locations by Property Insurance Exposure subject to TRIP Property Coverage (Metropolitan Areas)	<p>For each corresponding region, provide the ZIP codes for the top 5 aggregations of property insurance exposure within the metropolitan areas included in Rows 3-28.</p> <ul style="list-style-type: none"> <li>ZIP codes entered into this field will not necessarily correspond to 5 different regions (an insurer could conceivably have its top 5 aggregations by ZIP Code within the same city).</li> </ul>
F35-F39	Amount of Top 5 Largest Accumulated Exposure Locations by Property Insurance Exposure subject to TRIP Property Coverage (Metropolitan Areas)	For each corresponding ZIP code listed in Cells C35-C39, provide the total accumulated property insurance exposure within that ZIP code.
C43-C47	ZIP Code of Top 5 Largest Accumulated Exposure Locations by Payroll (Non-Metropolitan Areas)	No entry required. This information will be reported on the insurer's behalf by NCCI and/or California WCIRB.
D43-D47	Amount of Top 5 Largest Accumulated Exposure Locations by Payroll (Non-Metropolitan Areas)	No entry required. This information will be reported on the insurer's behalf by NCCI and/or California WCIRB.
E43-E47	ZIP Code of Top 5 Largest Accumulated Exposure Locations by Property Insurance Exposure subject to TRIP Property Coverage (Non-Metropolitan Areas)	<p>For non-metropolitan areas included in Row 29, provide the ZIP codes for the top 5 aggregations of property insurance exposure.</p> <ul style="list-style-type: none"> <li>If total non-allocated exposures from Row 30 fall within the top 5 aggregations, enter them using a ZIP code of 99999.</li> </ul>

Geographic Exposures (Nationwide)		
Section	Field Name	Comments
F43-F47	Amount of Top 5 Largest Accumulated Exposure Locations by Property Insurance Exposure subject to TRIP Property Coverage (Non-Metropolitan Areas)	For each corresponding ZIP code listed in Cells C43-C47, provide the total accumulated property insurance exposure within that ZIP code.
D49	ZIP Code Associated with Largest Probable Maximum Loss (PML)	<p>Provide the ZIP code for the insurer group or company's largest Probable Maximum Loss (for all lines) at a single street level address location.</p> <ul style="list-style-type: none"> <li>Assume the detonation of a 5-6 ton truck bomb at that location (use the blast size within the range that the insurer typically uses in connection with such analyses).</li> <li>If you do not typically perform such analyses, use the blast radius estimates found in the <i>Reinsurance (Nationwide) Worksheet</i>, Line 27.</li> </ul>
D50	Largest PML at a Single Location (Amount)	<p>Provide the amount of the insurer group or company's largest Probable Maximum Loss (for all lines) at the location identified in Cell D49.</p> <ul style="list-style-type: none"> <li>Assume the detonation of a 5-6 ton truck bomb at that location (use the blast size within the range that the insurer typically uses in connection with internal modeling projections).</li> <li>Include the amount of the reporting insurer's gross loss (above any deductible or retention of the policyholder and not including private reinsurance recovery or TRIP claim).</li> </ul>

### Instructions for Reinsurance (Nationwide) Worksheet

**Note:** This Worksheet is set up as a questionnaire, with certain amounts requested, yes or no answers sought, and associated explanation to the extent necessary. As a result, and unlike the other worksheets, the data sought may be more easily obtainable from an individual with knowledge of the reinsurance arrangements of the reporting entity, as distinguished from the mechanism of data queries to existing systems. The questions are limited to reinsurance purchased from unaffiliated third-party companies, and do not include reinsurance transactions within a group of affiliated insurers.

<i>Reinsurance (Nationwide)</i>		
Section	Field Name	Comments
C3-D3	Size of TRIP 2017 Deductible (Cell H4 of Insurer Group Affiliations Worksheet x 20%)	Provide the insurance group or company's 2017 TRIP deductible. <ul style="list-style-type: none"> <li>This figure is calculated based upon the 2016 TRIP-Eligible DEP, which is reported in Cell H4 of the <i>Insurer Group Affiliations Worksheet</i>.</li> </ul>
C4-D4	Total 2017 Limits Any One Loss of Purchased Reinsurance Covering TRIP Loss	For reinsurance purchased by the insurance group or company, provide the per loss limit for losses subject to TRIP.
C5-D5	Total 2017 Aggregate Limits of Purchased Reinsurance Covering TRIP Loss	For reinsurance purchased by the insurance group or company, provide the 2017 maximum aggregate reinsurance limit per calendar year for losses subject to TRIP.
C6-D6	2017 Attachment Point of Purchased Treaty Reinsurance Covering TRIP Loss	For treaty reinsurance purchased by the insurance group or company, provide the 2017 attachment point for losses subject to TRIP.
C7-D7	2017 Co-Participation Share of Purchased Treaty Reinsurance Covering TRIP Loss	For treaty reinsurance purchased by the insurance group or company, provide the 2017 co-participation share for losses subject to TRIP exposure.
C8-D8	Total 2017 Limits Any One Loss of Purchased Reinsurance Covering Natural Catastrophe Loss	For reinsurance purchased by the insurance group or company, provide the per loss limit for losses subject to TRIP. <ul style="list-style-type: none"> <li>Include losses in all lines of insurance, whether or not subject to TRIP.</li> </ul>



Reinsurance (Nationwide)		
Section	Field Name	Comments
C9-D9	Total 2017 Aggregate Limits of Purchased Reinsurance Covering Natural Catastrophe Loss	For treaty reinsurance purchased by the insurance group or company, provide the 2017 maximum aggregate reinsurance limit per calendar year for natural catastrophe losses. <ul style="list-style-type: none"> <li>Include losses in all lines of insurance, whether or not subject to TRIP.</li> </ul>
C10-D10	2017 Attachment Point of Purchased Treaty Reinsurance Covering Natural Catastrophe Loss	For treaty reinsurance purchased by the insurance group or company, provide the 2017 attachment point for natural catastrophe losses. <ul style="list-style-type: none"> <li>Include losses in all lines of insurance, whether or not subject to TRIP.</li> </ul>
C11-D11	2017 Co-Participation Share of Purchased Treaty Reinsurance Covering Natural Catastrophe Loss	For treaty reinsurance purchased by the insurance group or company, provide the 2017 co-participation share, if any, for natural catastrophe losses.
C12-D12	Any reinsurance exclusions for TRIP Certified Foreign Acts of Terrorism?	Select whether during any reinsurance purchased in 2017 had any exclusions for TRIP-certified acts of terrorism caused by foreign individuals or actors.
C13-D13	Any reinsurance exclusions for TRIP Certified Domestic Acts of Terrorism?	Select whether during any reinsurance purchased in 2017 had any exclusions for TRIP-certified acts of terrorism caused by domestic acts of terrorism.
C14-D14	Reinsurance for NBCR WC Exposures Resulting from Certified Acts of Terrorism?	Select whether any reinsurance purchased in 2017 included any coverage for workers' compensation losses involving TRIP-certified acts of terrorism resulting from nuclear, biological, chemical or radiological (NBCR) exposures.
C15-D15	If Yes, Total 2017 Limits of NBCR Reinsurance for Certified Acts of Terrorism involving WC Loss	If the response in Cell C14 was "yes", provide the per loss limit for workers' compensation losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.
C16-D16	If Yes, 2017 Attachment Point of NBCR Reinsurance for Certified Acts of Terrorism involving WC Loss	If the response in Cell C14 was "yes", provide the 2017 attachment point for workers' compensation losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.
C17-D17	If Yes, 2017 Co-Participation Share (if any) of NBCR Reinsurance For Certified Acts of Terrorism involving WC Loss	If the response in Cell C14 was "yes", provide the 2017 co-participation share for workers' compensation losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.

<i>Reinsurance (Nationwide)</i>		
Section	Field Name	Comments
C18-D18	Reinsurance for NBCR Property Loss Resulting from Certified Acts of Terrorism?	Select whether any reinsurance purchased in 2017 included any coverage for property losses involving TRIP-certified acts of terrorism resulting NBCR exposures.
C19-D19	If Yes, Total 2017 Limits of NBCR Reinsurance for Certified Acts of Terrorism involving Property Loss	If the response in Cell C18 was "yes", provide the per loss limit for property losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.
C20-D20	If Yes, 2017 Attachment Point of NBCR Reinsurance for Certified Acts of Terrorism involving Property Loss	If the response in Cell C18 was "yes", provide the 2017 attachment point for property losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.
C21-D21	If Yes, 2017 Co-Participation Share (if any) of NBCR Reinsurance for Certified Acts of Terrorism involving Property Loss	If the response in Cell C18 was "yes", provide the 2017 co-participation share for property losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.
C22-D22	Reinsurance for NBCR Liability Loss Resulting from Certified Acts of Terrorism?	Select whether any reinsurance purchased in 2017 included any coverage for liability losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.
C23-D23	If Yes, Total 2017 Limits of NBCR Reinsurance for Certified Acts of Terrorism involving Liability Loss	If the response in Cell C22 was "yes", provide the per loss limit for liability losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.
C24-D24	If Yes, 2017 Attachment Point of NBCR Reinsurance for Certified Acts of Terrorism involving Liability Loss	If the response in Cell C22 was "yes", provide the 2017 attachment point for liability losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.
C25-D25	If Yes, 2017 Co-Participation Share (if any) of NBCR Reinsurance for Certified Acts of Terrorism involving Liability Loss	If the response in Cell C22 was "yes", provide the 2017 co-participation share for liability losses involving TRIP-certified acts of terrorism resulting from NBCR exposures.

Reinsurance (Nationwide)		
Section	Field Name	Comments
C26-D26	Any other reinsurance exclusions specifically applicable to Certified Acts of Terrorism under TRIP?	<p>In Cell C26, select whether the insurance group or company's 2017 reinsurance contracts contained any additional exclusions that could preclude coverage for losses involving TRIP-certified acts of terrorism.</p> <p>In Cell D26, identify the exclusion(s).</p>
C27-C34	Loss to Group or Company within TRIP Deductible, Private Reinsurance Recovery, Deductible/Retention of Insureds, Claim under TRIP, Co-Pay Obligation	<p>The last series of questions seeks information as to how a particular defined loss event (Line 27) would likely affect the responding insurer group or reporting insurer, in terms of the total projected loss it would likely sustain (Line 28), with that amount divided into six categories:</p> <ul style="list-style-type: none"> <li>• Deductible or retention obligation of insureds under triggered policies (Line 29);</li> <li>• Net loss to group or company within TRIP deductible, net of policyholder obligations or private reinsurance (Line 30);</li> <li>• Any private reinsurance recovery of amounts within the reporting insurer's deductible (Line 31);</li> <li>• Projected recovery from TRIP (Line 32);</li> <li>• The net loss of the insurer group or reporting individual insurer above its deductible within the co-pay obligation (Line 33); and</li> <li>• Any private reinsurance recovery of amounts above the reporting insurer's deductible within the co-pay obligation (Line 34).</li> </ul> <ul style="list-style-type: none"> <li>• Use the definitions, instructions and assumptions found in the Worksheet at Line 27.</li> <li>• Use the blast size within the 5-6 ton range that the insurer typically uses in connection with internal modeling projections.</li> <li>• If the insurer does not typically employ such scenarios, provide estimates using the parameters identified in Line 27.</li> <li>• Not all reporting insurers will anticipate losses under the stated scenario.</li> <li>• Because the total projected loss (Line 28) is meant to be the sum of the various components identified in Lines 29-34, the figure entered in C28 <b>must</b> equal the sum of the figures entered in C28-C34.</li> </ul>

# **What Should and Can be Done Right Now?**

## **Exhibit B**

**Copy of the Data Collection Template:  
2018 Combined Treasury and NIAC TRIPRA Data Call  
For (Non Small) Insurance Groups or Companies**

	B	C
3	NAIC Group Code	Insurer Group Name
4		

	G	H
3	Total 2016 Policyholder Surplus	
4	Total 2016 TRIP-Eligible DEP (all lines)	

	B	C	D
8	NAIC Company Code	Insurance Company Name	Type of Insurer
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			

OMB No. 1505-0257

## TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES

Expiration: \_\_\_\_\_

## POLICIES AND DIRECT EARNED PREMIUM BY JURISDICTION

Jurisdiction:

2

B		C	D	E	F	G	H
			Direct Earned Premium				
				Total 2017 TRIP-Eligible DEP when Terrorism Risk Coverage Not Purchased	Total 2017 TRIP-Eligible DEP when Terrorism Risk Coverage Provided for Disclosed \$0 Charge	Total 2017 TRIP-Eligible DEP when Terrorism Risk Coverage Premium Charged	Total 2017 Disclosed Terrorism Risk Coverage DEP Charged
6	TRIP-Eligible Line of Coverage	NAIC Line (Commercial Only)	Total 2017 TRIP-Eligible DEP (all policies)				
7	Fire	1	\$ -				
8	Allied Lines	2.1	\$ -				
9	Commercial Multiple Peril (non-liability portion)	5.1	\$ -				
10	Commercial Multiple Peril (liability portion)	5.2	\$ -				
11	Ocean Marine	8	\$ -				
12	Inland Marine	9	\$ -				
13	Workers' Compensation	16	\$ -				
14	Excess Workers' Compensation	17.3	\$ -				
15	Other Liability	17	\$ -				
16	Products Liability	18	\$ -				
17	Aircraft (all perils)	22	\$ -				
18	Boiler and Machinery	27	\$ -				
19	TOTALS		\$ -	\$ -	\$ -	\$ -	\$ -

21	Total 2017 Number of Policies Containing TRIP-Eligible Coverage	
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Policies and DEP (Juris.)

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OMB No. 1505-0257

Expiration: \_\_\_\_\_

**TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES**  
**POLICIES AND DIRECT EARNED PREMIUM BY JURISDICTION**

I	J	K	L
Number of Policies			
Total 2017 Number of Policies by Line (Terrorism Risk Coverage Not Purchased)	Total 2017 Number of Policies by Line (Terrorism Risk Coverage Provided for Disclosed \$0 Charge)	Total 2017 Number of Policies by Line (Terrorism Risk Coverage Premium Charged)	Total 2017 Number of Policies by Line
			0
			0
			0
			0
			0
			0
			0
			0
			0
			0
			0
			0
			0
0	0	0	0

Policies and DEP (Juris.)  
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OMB No. 1505-0257

**TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON SMALL) GROUPS OR COMPANIES**

Expiration: \_\_\_\_\_

**STANDALONE TERRORISM (NATIONWIDE)**

	<b>B</b>	<b>C</b>
<b>2</b>	<b>Element</b>	<b>Amount</b>
<b>3</b>	2017 DEP for Standalone Terrorism Policies	
<b>4</b>	Portion of 2017 DEP for TRIP Certified Terrorism Loss Coverage	
<b>5</b>	Portion of 2017 DEP for Non-Certified Terrorism Loss Coverage	
<b>6</b>	2017 Number of Standalone Terrorism Policies Issued	
<b>7</b>	2017 Number of Standalone Terrorism Policies Covering TRIP Loss Issued	
<b>8</b>	2017 Total Property Insurance Exposure for Standalone Terrorism Policies Covering TRIP Loss	
<b>9</b>	2017 Total Limits of Liability for Standalone Terrorism Policies Covering TRIP Loss	

Standalone Terrorism (US)  
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OMB No. 1505-0257

TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES

Expiration: \_\_\_\_\_

CYBER (NATIONWIDE)

	B	C	D	E
2	Element	Standalone Cyber	Cyber Coverage Provided as Part of a Package Policy	Totals
3	2017 TRIP-Eligible DEP for Cyber Policies			
4	2017 TRIP-Eligible DEP for Cyber Policies Not Providing Coverage for Certified Acts of Terrorism Under TRIP			
5	2017 TRIP-Eligible DEP for Cyber Policies Providing Coverage for Certified Acts of Terrorism Under TRIP			
6	2017 Total Disclosed Terrorism Risk Coverage DEP Charged Under Cyber Policies			
7	2017 Number of Cyber Policies Issued			
8	2017 Number of Cyber Policies Covering TRIP Loss Issued			
9	2017 Total Liability Policy Limits for Cyber Policies Covering TRIP Loss			

OMB No. 1505-0257  
Expiration: \_\_\_\_\_

**TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL- INSURER (NON-SMALL) GROUPS OR COMPANIES**  
**EXPOSURE BASES BY JURISDICTION**

Jurisdiction:							
2							
	B	C	D	E	F	G	H
		NAIC Line (Commercial Only)	Total 2017 Property Insurance Exposure Subject to Terrorism Risk Coverage	Total 2017 Policyholder Deductibles under 2017 Property Insurance Exposure Subject to Terrorism Risk Coverage	Total 2017 Property Insurance Exposure Not Subject to Terrorism Risk Coverage	Policyholder Deductibles under 2017 Property Insurance Exposure Not Subject to Terrorism Risk Coverage	Total 2017 Limits of Liability Subject to Terrorism Risk Coverage
5	TRIP-Eligible Line of Coverage						
6	Fire	1					
7	Allied Lines	2.1					
8	Commercial Multiple Peril (non-liability portion)	5.1					
9	Commercial Multiple Peril (liability portion)	5.2					
10	Ocean Marine	8					
11	Inland Marine	9					
12	Workers' Compensation	16					
13	Excess Workers' Compensation	17.3					
14	Other Liability	17					
15	Products Liability	18					
16	Aircraft (all perils)	22					
17	Boiler and Machinery	27					
18	TOTALS		\$ -	\$ -	\$ -	\$ -	\$ -

Exposure Bases (Juris.)  
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Expiration: \_\_\_\_\_

**TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES**  
**EXPOSURE BASES BY JURISDICTION**

[illegible]

Exposure Bases (Juris.)  
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OMB No. 1505-0257

## TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES

Expiration: \_\_\_\_\_

POLICYHOLDER INDUSTRY CODE (NATIONWIDE)  
(NAICS, SIC, or OTHER)

	B	C	D	Property			
				Total 2017 Disclosed Terrorism Risk Coverage DEP Charged	Total 2017 TRIP- Eligible DEP When Terrorism Risk Coverage Not Purchased	Total 2017 TRIP- Eligible DEP When Terrorism Risk Coverage Purchased	Total 2017 TRIP- Eligible DEP
3		Code	Description				
4	NAICS Code	11	Agriculture, Forestry, Fishing & Hunting				\$ -
5		21	Mining, Quarrying, and Oil & Gas Extraction				\$ -
6		22	Utilities				\$ -
7		23	Construction				\$ -
8		31-33	Manufacturing				\$ -
9		42	Wholesale Trade				\$ -
10		44-45	Retail Trade				\$ -
11		48-49	Transportation & Warehousing				\$ -
12		51	Information				\$ -
13		52	Finance & Insurance				\$ -
14		53	Real Estate and Rental and Leasing				\$ -
15		54	Professional, Scientific & Technical Service				\$ -
16		55	Management of Companies and Enterprises				\$ -
17		56	Administrative & Support & Waste Management & Remediation Services				\$ -
18		61	Educational Services				\$ -
19		62	Health Care & Social Assistance				\$ -
20		71	Arts, Entertainment & Recreation				\$ -
21		72	Accommodation & Food Services				\$ -
22		81	Other Services (except Public Administration)				\$ -
23		92	Public Administration				\$ -
24		N/A	Unavailable				\$ -

Industry (NAICS, SIC, or OTHER)

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OMB No. 1505-0257  
Expiration: \_\_\_\_\_

**TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES**  
**POLICYHOLDER INDUSTRY CODE (NATIONWIDE)**  
**(NAICS, SIC, or OTHER)**

	B	C	D	E	F	G	H
				Property			
				Total 2017 Disclosed Terrorism Risk Coverage DEP Charged	Total 2017 TRIP-Eligible DEP When Terrorism Risk Coverage Not Purchased	Total 2017 TRIP-Eligible DEP When Terrorism Risk Coverage Purchased	Total 2017 TRIP-Eligible DEP
3		Code	Description				
25	SIC Code	01-09	Agriculture, Forestry & Fishing				\$ -
26		10-14	Mining				\$ -
27		15-17	Construction				\$ -
28		20-39	Manufacturing				\$ -
			Transportation, Communications, Electric, Gas &				
29		40-49	Sanitary Services				\$ -
30		50-51	Wholesale Trade				\$ -
31		52-59	Retail Trade				\$ -
32		60-67	Finance, Insurance & Real Estate				\$ -
33		70-89	Services				\$ -
34		91-99	Public Administration				\$ -
35		N/A	Unavailable				\$ -
36	Other						\$ -
37							\$ -
38							\$ -
39							\$ -
40							\$ -
41							\$ -
42							\$ -
43		N/A	Unavailable				\$ -
44			TOTALS:	\$ -	\$ -	\$ -	\$ -

Industry (NAICS, SIC, or OTHER)  
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**TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES**  
**POLICYHOLDER INDUSTRY CODE (NATIONWIDE)**  
**(NAICS, SIC, or OTHER)**

	B	C	D	I	J	K	L	M	N
				Liability				Workers' Compensation	
				Total 2017 Disclosed Terrorism Risk Coverage DEP Charged	Total 2017 TRIP-Eligible DEP When Terrorism Risk Coverage Not Purchased	Total 2017 TRIP-Eligible DEP When Terrorism Risk Coverage Purchased	Total 2017 TRIP-Eligible DEP	Total 2017 Disclosed Terrorism Risk Coverage DEP Charged	Total 2017 TRIP-Eligible DEP
3		Code	Description						
4	NAICS Code	11	Agriculture, Forestry, Fishing & Hunting				\$ -		
5		21	Mining, Quarrying, and Oil & Gas Extraction				\$ -		
6		22	Utilities				\$ -		
7		23	Construction				\$ -		
8		31-33	Manufacturing				\$ -		
9		42	Wholesale Trade				\$ -		
10		44-45	Retail Trade				\$ -		
11		48-49	Transportation & Warehousing				\$ -		
12		51	Information				\$ -		
13		52	Finance & Insurance				\$ -		
14		53	Real Estate and Rental and Leasing				\$ -		
15		54	Professional, Scientific & Technical Service				\$ -		
16		55	Management of Companies and Enterprises				\$ -		
17			Administrative & Support & Waste Management & Remediation Services				\$ -		
18		61	Educational Services				\$ -		
19		62	Health Care & Social Assistance				\$ -		
20		71	Arts, Entertainment & Recreation				\$ -		
21		72	Accommodation & Food Services				\$ -		
22			Other Services (except Public Administration)				\$ -		
23			Public Administration				\$ -		
24			N/A Unavailable				\$ -		

Industry (NAICS, SIC, or OTHER)

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Expiration: \_\_\_\_\_

**TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES**  
**POLICYHOLDER INDUSTRY CODE (NATIONWIDE)**  
**(NAICS, SIC, or OTHER)**

	B	C	D	I	J	K	L	M	N
				Liability				Workers' Compensation	
				Total 2017 Disclosed Terrorism Risk Coverage DEP Charged	Total 2017 TRIP- Eligible DEP When Terrorism Risk Coverage Not Purchased	Total 2017 TRIP- Eligible DEP When Terrorism Risk Coverage Purchased	Total 2017 TRIP- Eligible DEP	Total 2017 Disclosed Terrorism Risk Coverage DEP Charged	Total 2017 TRIP- Eligible DEP
3		Code	Description						
25	SIC Code	01-09	Agriculture, Forestry & Fishing				\$ -		
26		10-14	Mining				\$ -		
27		15-17	Construction				\$ -		
28		20-39	Manufacturing				\$ -		
29		40-49	Transportation, Communications, Electric, Gas & Sanitary Services				\$ -		
30		50-51	Wholesale Trade				\$ -		
31		52-59	Retail Trade				\$ -		
32		60-67	Finance, Insurance & Real Estate				\$ -		
33		70-89	Services				\$ -		
34		91-99	Public Administration				\$ -		
35		N/A	Unavailable				\$ -		
36	Other						\$ -		
37							\$ -		
38							\$ -		
39							\$ -		
40							\$ -		
41							\$ -		
42							\$ -		
43		N/A	Unavailable				\$ -		
44			<b>TOTALS:</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Industry (NAICS, SIC, or OTHER)

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Expiration: \_\_\_\_\_

POLICYHOLDER INDUSTRY CODE (NATIONWIDE)  
(NAICS, SIC, or OTHER)

	B	C	D	O
				All Categories
3		Code	Description	Total 2017 TRIP-Eligible DEP
4	NAICS Code	11	Agriculture, Forestry, Fishing & Hunting	\$ -
5		21	Mining, Quarrying, and Oil & Gas Extraction	\$ -
6		22	Utilities	\$ -
7		23	Construction	\$ -
8		31-33	Manufacturing	\$ -
9		42	Wholesale Trade	\$ -
10		44-45	Retail Trade	\$ -
11		48-49	Transportation & Warehousing	\$ -
12		51	Information	\$ -
13		52	Finance & Insurance	\$ -
14		53	Real Estate and Rental and Leasing	\$ -
15		54	Professional, Scientific & Technical Service	\$ -
16		55	Management of Companies and Enterprises	\$ -
17			Administrative & Support & Waste Management & Remediation Services	\$ -
18		61	Educational Services	\$ -
19		62	Health Care & Social Assistance	\$ -
20		71	Arts, Entertainment & Recreation	\$ -
21		72	Accommodation & Food Services	\$ -
22		81	Other Services (except Public Administration)	\$ -
23		92	Public Administration	\$ -
24		N/A	Unavailable	\$ -

Industry (NAICS, SIC, or OTHER)

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Expiration: \_\_\_\_\_

**TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES**  
**POLICYHOLDER INDUSTRY CODE (NATIONWIDE)**  
**(NAICS, SIC, or OTHER)**

	B	C	D	O
				<b>All Categories</b>
3		<b>Code</b>	<b>Description</b>	<b>Total 2017 TRIP-Eligible DEP</b>
25	<b>SIC Code</b>	01-09	Agriculture, Forestry & Fishing	\$ -
26		10-14	Mining	\$ -
27		15-17	Construction	\$ -
28		20-39	Manufacturing	\$ -
29		40-49	Transportation, Communications, Electric, Gas & Sanitary Services	\$ -
30		50-51	Wholesale Trade	\$ -
31		52-59	Retail Trade	\$ -
32		60-67	Finance, Insurance & Real Estate	\$ -
33		70-89	Services	\$ -
34		91-99	Public Administration	\$ -
35		N/A	Unavailable	\$ -
36	<b>Other</b>			\$ -
37				\$ -
38				\$ -
39				\$ -
40				\$ -
41				\$ -
42				\$ -
43		N/A	Unavailable	\$ -
44			<b>TOTALS:</b>	\$ -

Industry (NAICS, SIC, or OTHER)

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	B	C	D	E	F	G
	Region	Description	Total 2017 Payroll Subject to TRIP Coverage under Primary WC Coverage	Total 2017 Payroll Subject to TRIP Coverage under Excess WC Coverage	Total 2017 Property Insurance Exposure Subject to TRIP Property Coverage	Total 2017 Property Insurance Exposure Not Subject to TRIP Property Coverage
2	Atlanta, GA	All zip codes within the four counties of Fulton, DeKalb, Clayton, and Cobb.				
4	Baltimore, MD	All zip codes in Baltimore City, all zip codes in Baltimore County excluding 21013, 21020, 21023, 21030, 21031, 21051, 21053, 21057, 21065, 21071, 21074, 21082, 21087, 21092, 21102, 21105, 21111, 21120, 21131, 21136, 21152, 21155, 21161; include the following zip codes from Anne Arundel County – 21060, 21061, 21062, 21076, 21077, 21090, 21098, 21122, 21123, 21144, 21225, 21226, 21240.				
5	Boston, MA	All zip codes from Suffolk County; for Essex County only include zip codes 01901 through 01908, 01910, 01945, 01960, 01961, 01970, 01971; for Norfolk County only include zip codes 02026, 02027, 02030, 02062, 02090, 02169, 02170, 02171, 02184 through 02191, 02269, 02445, 02446, 02447, 02457, 02467, 02481, 02482, 02492, 02494; for Middlesex County only include zip codes 01701 through 01705, 01760, 01770, 01776, 01778, 01801, 01803, 01805 through 01808, 01813, 01815, 01866, 01867, 01880, 01888, 01890, 02138 through 02145, 02148, 02149, 02153, 02155, 02156, 02176, 02180, 02212, 02238, 02239, 02420, 02421, 02451 through 02456, 02458 through 02462, 02464 through 02468, 02471, 02472, 02474 through 02479, 02493, 02495.				
6	Buffalo, NY	All zip codes for Buffalo NY (14201 through 14228, 14231, 14233, 14240, 14241, 14260, 14261, 14263, 14264, 14265, 14267, 14269, 14270, 14272, 14273, 14276, 14280); Niagara Falls in Niagara county (14109, 14301, 14302, 14303, 14304, 14305); and include the nearby suburbs in Erie and Niagara counties (14010, 14026, 14031, 14032, 14037, 14043, 14051, 14059, 14068, 14075, 14086, 14120, 14127, 14140, 14150, 14151).				
7	Chicago, IL	All zip codes within the four counties of Cook, DuPage, Lake, and Will.				
8	Cleveland, OH	All zip codes within the two counties of Cuyahoga and Lake.				
9	Dallas/Ft. Worth, TX	All zip codes in the two counties of Dallas and Tarrant (Fort Worth).				

Geographic (US)

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OMB No. 1505-0257

## TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES

Expiration: \_\_\_\_\_

## GEOGRAPHIC EXPOSURES (NATIONWIDE)

10	Denver, CO	All zip codes within the counties of Adams, Arapahoe, and Denver.				
11	Detroit, MI	All zip codes within the counties of Macomb, Oakland, and Wayne.				
12	Houston, TX	All zip codes in Harris County.				
13	Las Vegas, NV	All zip codes in Clark County.				
14	Los Angeles, CA	All zip codes within the two counties of Los Angeles and Orange.				
15	Miami, FL	All zip codes in Miami-Dade County.				
16	Minneapolis/St. Paul, MN	All zip codes in the two counties of Hennepin and Ramsey.				
17	New York, NY	All zip codes within the five counties of Kings (Brooklyn), Queens, New York (Manhattan), Bronx, and Richmond (Staten Island).				
18	Newark, NJ	All zip codes for the cities of Newark (07101 through 07108, 07112, 07114, 07175, 07182, 07184, 07188, 07189, 07191, 07192, 07193, 07194, 07195, 07198, 07199) and Elizabeth (07201, 07202, 07206, 07207, 07208).				
19	Orlando, FL	All zip codes in the two counties of Orange and Seminole.				
20	Philadelphia, PA	All zip codes in Philadelphia County.				
21	Phoenix, AZ	All zip codes in Maricopa County.				
22	San Diego, CA	All zip codes in San Diego County.				
23	San Francisco, CA	All zip codes within the two counties of San Francisco and San Mateo.				
24	San Jose, CA	All zip codes in Santa Clara County.				
25	Seattle, WA	All zip codes in King County.				
26	St. Louis, MO	All zip codes in the two counties of St. Louis City and St. Louis.				
27	Tampa/St. Petersburg, FL	All zip codes in the two counties of Hillsborough and Pinellas.				
28	Washington, DC	All zip codes within Washington D.C. and all zip codes within the two counties of Arlington, VA and Alexandria City, VA.				
29	All other Locations in the U.S.	All areas in the US other than those specified in Cells C3-C28.				
30	Unknown	If locations are unknown for a policy, enter the requested information here.				
31	Subtotal	All metro regions specified in Cells C3-C28.	\$	-	\$	-
32	Total	All metro regions and other locations specified in Cells C3-C30.	\$	-	\$	-

Geographic (US)

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	Top 5 Largest Accumulated Exposure Locations (Metro Areas, (Rows C3 to C28))	Payroll Exposure		Property Exposure	
		ZIP Code of Top 5 Largest Accumulated Exposure Locations by Payroll	Amount of Top 5 Largest Accumulated Exposure Locations by Payroll	ZIP Code of Top 5 Largest Accumulated Exposure Locations by Property Insurance Exposure subject to TRIP Property Coverage	Amount of Top 5 Largest Accumulated Exposure Locations by Property Insurance Exposure subject to TRIP Property Coverage
35	1.				
36	2.				
37	3.				
38	4.				
39	5.				

	Top 5 Largest Accumulated Exposure Locations (All Other Non-Metro Areas, (Rows C29-C30))	Payroll Exposure		Property Exposure	
		ZIP Code of Top 5 Largest Accumulated Exposure Locations by Payroll	Amount of Top 5 Largest Accumulated Exposure Locations by Payroll	ZIP Code of Top 5 Largest Accumulated Exposure Locations by Property Insurance Exposure subject to TRIP Property Coverage	Amount of Top 5 Largest Accumulated Exposure Locations by Property Insurance Exposure subject to TRIP Property Coverage
43	1.				
44	2.				
45	3.				
46	4.				
47	5.				

49	ZIP Code Associated with Largest Probable Maximum Loss (PML)	
50	Largest PML at a Single Location (Amount)	

OMB No. 1505-0257

## TERRORISM RISK INSURANCE PROGRAM 2018 DATA CALL: INSURER (NON-SMALL) GROUPS OR COMPANIES

Expiration: \_\_\_\_\_

## REINSURANCE (NATIONWIDE)

B		C	D
2	Element	Response	Description or Explanation (if any)
3	Size of TRIP 2017 Deductible (Cell H4 of Insurer Group Affiliations Chart x 20%)		
4	Total 2017 Limits Any One Loss of Purchased Reinsurance Covering TRIP Loss		
5	Total 2017 Aggregate Limits of Purchased Reinsurance Covering TRIP Loss		
6	2017 Attachment Point of Purchased Treaty Reinsurance Covering TRIP Loss		
7	2017 Co-Participation Share of Purchased Treaty Reinsurance Covering TRIP Loss		
8	Total 2017 Limits Any One Loss of Purchased Reinsurance Covering Natural Catastrophic Loss		
9	Total 2017 Aggregate Limits of Purchased Reinsurance Covering Natural Catastrophic Loss		
10	2017 Attachment Point of Purchased Treaty Reinsurance Covering Natural Catastrophic Loss		
11	2017 Co-Participation Share of Purchased Treaty Reinsurance Covering Natural Catastrophic Loss		
12	Any reinsurance exclusions for TRIP Certified Foreign Acts of Terrorism?		
13	Any reinsurance exclusions for TRIP Certified Domestic Acts of Terrorism?		
14	Reinsurance for NBCR WC Exposures Resulting from Certified Acts of Terrorism?		
15	If Yes, Total 2017 Limits of NBCR Reinsurance for Certified Acts of Terrorism involving WC Loss		
16	If Yes, 2017 Attachment Point of NBCR Reinsurance for Certified Acts of Terrorism involving WC Loss		
17	If Yes, 2017 Co-Participation Share (if any) of NBCR Reinsurance For Certified Acts of Terrorism involving WC Loss		
18	Reinsurance for NBCR Property Loss Resulting from Certified Acts of Terrorism?		
19	If Yes, Total 2017 Limits of NBCR Reinsurance for Certified Acts of Terrorism involving Property Loss		
20	If Yes, 2017 Attachment Point of NBCR Reinsurance for Certified Acts of Terrorism involving Property Loss		
21	If Yes, 2017 Co-Participation Share (if any) of NBCR Reinsurance for Certified Acts of Terrorism involving Property Loss		
22	Reinsurance for NBCR Liability Loss Resulting from Certified Acts of Terrorism?		
23	If Yes, Total 2017 Limits of NBCR Reinsurance for Certified Acts of Terrorism involving Liability Loss		
24	If Yes, 2017 Attachment Point of NBCR Reinsurance for Certified Acts of Terrorism involving Liability Loss		
25	If Yes, 2017 Co-Participation Share (if any) of NBCR Reinsurance for Certified Acts of Terrorism involving Liability Loss		
26	Any other reinsurance exclusions specifically applicable to TRIP Certified Acts of Terrorism?		

Reinsurance (US)

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Expiration: \_\_\_\_\_

REINSURANCE (NATIONWIDE)

Using the following defined terrorism event, calculate and report the total projected loss under policies containing terrorism risk insurance subject to TRIP issued by the Group or Company, and then within that figure report the following:

- (1) the deductible or retention obligations of insureds under triggered policies for the insurer group (or single company that is not part of a group);
- (2) the projected amount of net loss the insurer group (or single company that is not part of a group) will sustain within its TRIP deductible, net of policyholder obligations or private reinsurance;
- (3) any private reinsurance recovery available to the group or company within the TRIP deductible;
- (4) the amount of the group or company's claim under TRIP;
- (5) the amount of the group or company's continuing net co-pay obligation under TRIP; and
- (6) any private reinsurance recovery available to the group or company within the Co-Pay Layer.

The scenario involves two separate, but related, attacks placing place on October 13, 2017 (a Friday).

1. At 11:00 a.m., a group of five terrorists detonate five suitcase bombs carried in luggage carts in the main departure area of Terminal 3 at O'Hare International Airport. Use the following estimates in calculating damages:

- The departure area sustains massive debris damage (50% property damage, 1% fire loss)
- Injuries: 25 blue/white collar worker deaths in total, and 100 injuries in total
- Assume that all of O'Hare Airport is closed for 7 days, and Terminal 3 is closed for 60 days.

2. At 11:30 a.m., a 5-6 ton truck bomb detonates at Willis Tower (233 S. Wacker Drive, Chicago, IL 60606). Assume that the loss does not involve any NBCR exposures. Assume also that the loss resulting from the explosion is characterized by the estimates below; however, if your group or company typically utilizes different damage assumptions for an explosion of this magnitude, please use those alternative assumptions:

- Zone 1 (100 meters from site): Collapse and fire following, 100% property damage, 10% fire loss
- Zone 2 (200 meters from site): Massive structural damage to surrounding properties, 50% property damage, 5% fire loss
- Zone 3 (400 meters from site): Heavy debris damage to surrounding properties, 25% property damage, 2.5% fire loss
- Zone 4 (500 meters from site): Light debris damage to surrounding properties, 10% property damage, 1% fire loss
- Injuries: 2,000 blue/white collar worker deaths in total, and 4,000 injuries in total

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28	Total Projected Loss under Policies Issued by Group or Company	\$ -
29	Deductible/Retention of Insureds under Policies issued by Group or Company	
30	Net Loss to Group or Company within TRIP Deductible	
31	Private Reinsurance Recovery within Deductible Layer	
32	Claim under TRIP	
33	Net Loss to Group or Company within Co-Pay Layer	
34	Private Reinsurance Recovery within Co-Pay Layer	

Reinsurance (US)

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**Notice under the Paperwork Reduction Act**

We estimate it will take you about 75 hours to complete this form. However, you are not required to provide the information requested unless a valid OMB control number is displayed on the form. Any comments or suggestions regarding this form should be sent to the Terrorism Risk Insurance Program Office, Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 1410 MT, Washington, DC 20220. Do not send completed forms to this address. Submit forms according to instructions provided at [www.tripsection111data.com](http://www.tripsection111data.com).

