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17 UNITED STATES DISTRICT COURT
 18 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

19 EILEEN-GAYLE COLEMAN
 20 and ROBERT CASTRO, on behalf of
 21 themselves and all others similarly
 22 situated,

23 Plaintiffs,

24 v.

25 UNITED SERVICES AUTOMOBILE
 26 ASSOCIATION and USAA GENERAL
 27 INDEMNITY COMPANY,

28 Defendants.

CASE NO. 3:21-cv-00217-RSH-KSC

**DEFENDANTS' NOTICE OF
 MOTION AND MOTION TO
 EXCLUDE THE REPORTS AND
 TESTIMONY OF JONATHAN
 GRIGLACK AND ALLAN
 SCHWARTZ IN SUPPORT OF CLASS
 CERTIFICATION; MEMORANDUM
 OF POINTS AND AUTHORITIES**

Judge: Hon. Robert S. Huie
 Action Filed: February 4, 2021

PER CHAMBERS RULES, NO ORAL
 ARGUMENT UNLESS SEPARATELY
 ORDERED BY THE COURT

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on August 25, 2023 or as soon thereafter as the
3 matter may be heard, in Courtroom 15A, located at 333 West Broadway, San Diego,
4 CA 92101, Defendants United Services Automobile Association and USAA General
5 Indemnity Company will move under Federal Rule of Evidence 702 and *Daubert v.*
6 *Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993) for an order excluding the re-
7 ports and testimony of Jonathan Griglack and Allan Schwartz submitted in support of
8 Plaintiffs’ Renewed Motion for Class Certification (Dkts. 119-1, 119-2, 119-3, 119-4).

9 This motion is based on this notice of motion and memorandum of points and
10 authorities, the pleadings and papers on file in this action, any argument in connection
11 with the motion, and anything else that this Court may take judicial notice of.

12
13 DATED: July 21, 2023

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

14
15
16 By: /s/ Kahn Scolnick
 Kahn Scolnick

17
18 *Attorneys for Defendants United Services*
19 *Automobile Association and USAA General*
20 *Indemnity Company*

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1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I. INTRODUCTION

3 Expert opinions are inadmissible if based on speculative assumptions. Here, the
4 assumptions underlying the work of Plaintiffs’ experts are not just speculative, they
5 violate California law and settled actuarial principles.

6 Plaintiffs’ theory is that USAA General Indemnity Company (GIC)
7 policyholders were unfairly charged more for auto insurance than United Services
8 Automobile Association (United Services) policyholders. They’ve retained two
9 experts, Messrs. Griglack and Schwartz, to try to come up with a method of
10 ascertaining whether an entire class of GIC policyholders actually paid more for their
11 auto coverage—and if so by what amount—compared to the counterfactual scenario in
12 which those GIC policyholders had been insured by United Services. Those experts’
13 task is to set up and solve a basic subtraction problem:

14 **What is the difference, if any, between**
15 **A (what GIC actually charged policyholders for insurance) and**
16 **B (what it *should have* charged them)?**

17 There is a fatal defect in Messrs. Griglack’s and Schwartz’s shared approach to this
18 two-variable problem: They haven’t come up with a reliable way of determining
19 *either A or B*. As a result, their model cannot reliably measure whether Plaintiffs (or
20 any other GIC policyholders) would have been better or worse off—or by how much—
21 if GIC policyholders’ premiums had been charged using United Services’ rates. The
22 Court should therefore exclude the declarations and testimony of both Mr. Griglack
23 and Mr. Schwartz.

24 For variable **A**—the premiums that any putative class member paid to GIC
25 during the class period—Mr. Griglack didn’t calculate what anyone *actually paid*.
26 Instead, he attempted to “derive” those amounts based on eight one-day “snapshots”
27 taken over a three-year period. An occasional-sampling approach would make *any*
28 model unreliable, but it’s particularly unsuited to this case. Auto-insurance

1 policyholders often make changes throughout their policy periods that result in large
2 swings in their premiums, like adding a car, changing addresses, or increasing a
3 coverage limit. Mr. Griglack’s model can’t account for those sorts of changes. His
4 inadequate sampling yields arbitrary deviations from the *actual* premiums paid to
5 GIC—in some cases higher, in others lower, to the average tune of **8.7%**. In short, Mr.
6 Griglack’s model cannot reliably determine the amount of GIC premium that any
7 putative class member actually paid, which is half of the equation for figuring out
8 whether policyholders are supposedly harmed.

9 The second half of the equation—variable **B**, which is the premium that, in
10 Plaintiffs’ view, policyholders *should have* paid—is flawed in an even more
11 fundamental way. For that counterfactual scenario, Mr. Griglack calculates the
12 premium each GIC policyholder would have paid if GIC had calculated premiums
13 using United Services’ rating system instead of its own rating system. But that
14 approach doesn’t reflect what would happen in any plausible counterfactual world
15 because it would be illegal.

16 There is only one legally permissible and actuarially sound method of setting
17 auto-insurance rates in California—it starts by projecting the dollar volume of claims
18 an insurer’s policyholders are expected to generate based on historic loss trends.
19 That’s precisely why GIC’s rates are higher than United Services’ rates: GIC’s
20 policyholders are, on average, a bigger risk. And the California Department of
21 Insurance—which regulates auto-insurance rates and must approve all rates before
22 they can be charged to policyholders—approved GIC’s and United Services’ different
23 rates and rating systems.

24 This all means that Mr. Griglack’s calculation of **B** depends on a flawed
25 premise: that GIC could somehow could have elected to charge United Services’ rates
26 or any rates *other than* those the Department approved for GIC. In other words, Mr.
27 Griglack’s model *assumes* Defendants would have violated California law by charging
28 different rates to GIC policyholders. Yet the only way for GIC to charge different rates

1 would be to “file a complete rate application” with the Department and receive the
2 Department’s approval of those new rates *before* they go into effect. Cal. Ins. Code
3 § 1861.05(b). This means that if GIC were to calculate its policyholders’ premiums
4 using United Services’ rating system—which is the key assumption baked into Mr.
5 Griglack’s methodology—then GIC would be liable for civil penalties. *See, e.g.*, Cal.
6 Ins. Code § 1858.07(a) (“Any person who uses any rate, rating plan, or rating system
7 in violation of this chapter is liable to the state for a civil penalty not to exceed five
8 thousand dollars (\$5,000) for each act”). Moreover, the Department almost certainly
9 would have taken steps to stop the company from continuing to charge unapproved
10 rates. *See, e.g.*, Cal. Ins. Code §§ 1858.2, 1858.3 (Commissioner’s powers to order
11 insurers to correct noncompliance).

12 In reality, the only lawful and actuarially sound method of creating Plaintiffs’
13 counterfactual world would be to collapse GIC and United Services policyholders into
14 a single new company, create a new rating system corresponding to the collective risk
15 profile of the combined group of policyholders, and then obtain the Department’s
16 approval of those new rates. And even that hypothetical scenario would not ensure that
17 officers and enlisted policyholders would be charged the same rates—no one can know
18 what rate structures the Department would approve for the new company or how any
19 particular GIC policyholders’ premiums would be impacted.

20 But Mr. Griglack doesn’t call for that sort of combination of policyholders into a
21 single risk pool that can be assigned new, common rates. Instead, he tries to short-
22 circuit the whole process by calculating GIC policyholders’ premiums based on the
23 rating system of United Services. This methodology yields numbers that have no
24 relation to what a GIC policyholder might have paid in a plausible, lawful, and
25 actuarially sound counterfactual world where GIC charged different rates.

26 Mr. Schwartz does nothing to make up for these shortcomings. He serves as
27 little more than a human calculator. He offers a model (with a couple of slight
28 variations) for determining whether and to what extent policyholders are injured, and,

1 as he admitted in his depositions, his model is completely derivative of Mr. Griglack’s
2 “snapshots” of what GIC policyholders actually paid and what they supposedly should
3 have paid on eight sample dates. In other words, the model is only as reliable as Mr.
4 Griglack’s underlying (flawed) guesstimates.

5 Naturally, putting two unreliable numbers together doesn’t yield a reliable result.
6 The output of these experts’ shared analysis is arbitrary and untethered to any valid
7 assumptions. And that makes it impossible to determine which GIC policyholders, if
8 any, were injured, and in what amounts, by the alleged misconduct that Plaintiffs
9 challenge in this case—namely, the fact that GIC has different rates and a different
10 rating system from United Services.

11 Because Messrs. Griglack and Schwartz did not attempt the right analysis, and
12 because the resulting model yields irrelevant and unreliable results, these experts’
13 opinions cannot be used to support class certification (or otherwise). The Court should
14 therefore exclude their reports and testimony.

15 **II. BACKGROUND**

16 **A. United Services and GIC offer insurance to different groups of people**
17 **and price coverage based on the different risks those groups pose.**

18 United Services has insured members of the military and their families for 100
19 years. It generally sells insurance to certain commissioned and non-commissioned
20 officers. And since 1998, one of its subsidiaries, GIC, has generally sold insurance to
21 certain enlisted people (including, among others, lower-ranking military officers). In
22 other words, the group of people eligible to buy insurance from each company—the
23 “risk pool,” in insurance terms—is different.

24 The data show that United Services policyholders tend to have more driving
25 experience and are safer drivers; GIC policyholders tend to have less driving
26 experience and are more likely to make claims on their policies. Decl. of Quinn Saner
27 (“Saner Decl.”) ¶¶ 13–14.

1 When calculating rates for these two distinct groups, United Services and GIC
2 begin, as every insurer does, with recent loss history. Saner Decl. ¶¶ 10–12; Decl. of
3 Adrienne Liu (“Liu Decl.”), Ex. B (“Watkins Report”) pp. 4–6. The claims they paid
4 in recent years are the best guide to the claims they will likely need to pay out the next
5 year. Saner Decl. ¶ 12; Watkins Report p. 6. Once United Services and GIC have
6 determined how much they will likely need to pay out, they factor in expenses and
7 profit allowed by California law, then turn to figuring out how to spread that total
8 amount across their policyholders. Watkins Report pp. 5–6.

9 The first step in that process is straightforward—the losses are shared equally
10 across all policyholders by assigning all of them the same “base rate.” Saner Decl.
11 ¶ 10. The next step is more complicated—adjusting the base rate to account for the
12 relative degree of risk of each policyholder. *Id.* ¶ 18; Watkins Report p. 4. Those
13 adjustments account for the risk of theft (which is influenced, for example, by where
14 the policyholder’s car is garaged) and the risk of an accident (which can be predicted,
15 in part, by the policyholder’s driving safety record and how many miles they drive).
16 *See* Saner Decl. ¶¶ 18–22.

17 Many factors influence these adjustments, some more than others. The weight
18 and direction of each factor—that is, how much it matters, and whether it will increase
19 or reduce the base rate—are captured in “relativities.” Saner Decl. ¶¶ 24–25; Watkins
20 Report pp. 8–9. A relativity greater than one reflects higher-than-average risk and
21 works as a multiplier, increasing the base rate; a relativity lower than one reflects
22 lower-than-average risk and reduces the base rate. Saner Decl. ¶ 26.

23 The various relativities applicable to a given policyholder are then multiplied by
24 the base rate to generate a price for insurance—the premium. *See id.* ¶¶ 30–32. Some
25 policyholders will pay more than average, some less, but the sum of all their insurance
26 premiums will cover the claims payments United Services and GIC each expect to
27 make, plus allowable expenses and profit. *See* Watkins Report pp. 5–6.

28

1 Consider the following simplified example. Suppose that GIC and United
2 Services had the same number of policyholders (1,000) and the same total allowable
3 expenses and profit (\$200,000), but different expected losses. GIC expected to pay out
4 \$800,000, and United Services expected to pay out \$300,000. The base rate for each
5 company could be calculated (roughly) by spreading the expected losses and allowable
6 expenses and profits across all policyholders. For GIC, that would be \$1,000; for
7 United Services, it would be \$500. Those base rates would then be adjusted to account
8 for the risks posed by each policyholder. An especially risky United Services
9 policyholder (with high relativities) might pay \$2,000 in premium, and an especially
10 safe GIC policyholder (with low relativities) might pay \$480. Although the amounts
11 paid per policyholder would vary widely, in the aggregate they would be enough to
12 cover each insurer's expected claims payments and allowable expenses and profit.

13 In sum, the base rate reflects the *total amount* the insurer expects to pay for
14 claims, plus allowable expenses and profit, and the relativities determine the
15 *distribution* of that amount across all policyholders. The premium actually charged to
16 a given policyholder reflects their individual risk profile.

17 The premium charged also depends on the coverage the policyholder buys. The
18 price of insurance goes up and down when, among other things, policyholders move,
19 add new cars or drivers or coverages, or increase their policy limits for one or more
20 coverages. *See Saner Decl.* ¶ 41.

21 No matter how confident insurers may be in the accuracy of their rate
22 calculations, they aren't allowed to charge those rates without first getting approval
23 from California's Insurance Commissioner. Cal. Ins. Code § 1861.01(c). The
24 Commissioner may not approve a proposed rate if it is "excessive, inadequate, unfairly
25 discriminatory or otherwise in violation of" the Insurance Code. *Id.* § 1861.05(a). The
26 application and approval process—which all insurers must engage in when proposing
27 new rates—is "lengthy and time consuming" (often taking nearly two years start to
28 finish). *Decl. of Keith Wechsler ("Wechsler Decl.")* ¶ 27.

1 Complying, as they must, with this prior-approval scheme of ratemaking in
 2 California, United Services and GIC have consistently charged only rates that are pre-
 3 approved by the Commissioner. Wechsler Decl. ¶¶ 16, 22–29. Doing anything else
 4 would have been unlawful. *Id.* ¶ 22; Watkins Report p. 4; *see* Cal. Ins. Code
 5 § 1858.07(a). And because United Services and GIC are run independently, with
 6 separate risk pools, they have sought rate approval independently. Wechsler Decl.
 7 ¶¶ 16–21. Their approved rates are different as a result. *Id.* ¶¶ 19–20. The
 8 Commissioner has never claimed that the different rates he approved for either
 9 company were somehow unlawful. *See id.*

10 **B. Plaintiffs sue United Services and GIC for allegedly overcharging**
 11 **GIC policyholders.**

12 Plaintiffs Coleman and Castro are military veterans who are or were insured by
 13 GIC. They sued both GIC and United Services for allegedly charging GIC
 14 policyholders more than United Services policyholders under two theories. First,
 15 Plaintiffs claim that USAA discriminates against enlisted personnel “on the basis of
 16 military status” under anti-discrimination statutes. Dkt. 49 ¶¶ 83–103. Second, they
 17 allege that by not offering GIC policyholders who qualify as “good drivers” a United
 18 Services policy, GIC engages in unlawful and unfair business practices in violation of
 19 the Insurance Code and California’s Unfair Competition Law. *Id.* ¶¶ 71–81.

20 All of Plaintiffs’ claims fail unless they can show that putative class members
 21 were injured by USAA’s practice of insuring officers and enlisted persons in separate
 22 insurance companies with different rates. The Unfair Competition Law requires
 23 Plaintiffs to prove they suffered “a loss or deprivation of money or property sufficient
 24 to qualify as injury in fact, i.e., *economic injury*.” *Kwikset Corp. v. Superior Court*, 51
 25 Cal.4th 310, 322 (2011). Plaintiffs’ discrimination claims also require a showing of
 26 injury, as the complaint acknowledges. Dkt. 49 ¶¶ 91, 102. Likewise, Article III
 27 requires Plaintiffs to prove that every class member suffered a concrete injury, even if
 28 statutory damages are available. *TransUnion LLC v. Ramirez*, 141 S. Ct. 2190, 2205–

1 08 (2021). And Plaintiffs have defined the class to include only those “who paid more
2 for [their] policy than they would have paid under the premium pricing formula of
3 United Services.” Dkt. 49 ¶ 46; accord Dkt. 119 at 12 (proposed classes).

4 In short, Plaintiffs must prove that they and the putative class members paid
5 more than they otherwise would have but for the conduct they challenge as unlawful.

6 **C. Plaintiffs asked two experts to determine how much they and other**
7 **policyholders were supposedly overcharged for insurance from GIC.**

8 To support their theory that their GIC auto-insurance premiums were higher than
9 United Services’ premiums across an entire class of GIC policyholders, Plaintiffs hired
10 two actuaries, Jonathan Griglack and Allan Schwartz.

11 Originally, Mr. Griglack set out “to compare the premiums that GIC charged
12 policyholders to those premiums that would have been charged” by United Services as
13 of “*ten* dates from 2017 through 2021.” Dkt. 119-1 ¶ 4 (emphasis added). But for the
14 first nine months of that period, he was “unable to state *any opinions* to a reasonable
15 degree of actuarial certainty” due to his inability to accurately calculate nearly a third
16 of the GIC premiums in that period. Dkt. 85-1 at 3–4 (emphasis added). So Plaintiffs
17 lopped off those nine months—roughly 17% of the total period. Mr. Griglack thus
18 compared “the premiums that GIC charged policyholders to those premiums that
19 would have been charged” by United Services as of eight dates from March 31, 2018
20 to September 30, 2021. Dkt. 119-1 ¶¶ 4–5.

21 Mr. Griglack’s task was to come up with two numbers for each of the 200,000-
22 odd GIC policyholders in California: **A** (the amount actually paid) and **B** (the amount
23 they *should have* paid under Plaintiffs’ theory of liability). And Mr. Schwartz relied on
24 Mr. Griglack’s figures to construct a model for determining the difference between the
25 two, which, under Plaintiffs’ theory, supposedly would identify which class members
26 are “injured” (and, if so, in what amount). *See* Dkt. 119-3 ¶¶ 6, 16–17.

1 **1. Calculating Variable A: What policyholders actually paid.**

2 To determine variable A—how much premium each GIC policyholder actually
3 paid to GIC over the class period—Mr. Griglack doesn’t rely on direct evidence like
4 invoices, declarations pages, or other payment records. Liu Decl., Ex. H (“Griglack
5 Dep. II”) at 57:3–24; 155:20–156:4. Instead, he attempted to *derive* the amount paid
6 by each policyholder using eight “snapshots” taken between 2018 and 2021 in an effort
7 to figure out how much each policyholder paid to GIC in premiums. Dkt. 119-1
8 ¶¶ 26–28. But this exercise failed. Mr. Griglack admittedly “could not fully [or
9 accurately] replicate all the premiums.” Griglack Dep. II at 51:8–10; 127:4–8.

10 One reason for this failure is that Mr. Griglack resolved alleged “data defects”
11 on a completely arbitrary basis. If a policyholder insured two vehicles, but the second
12 vehicle appeared to have a “data error” associated with it, Mr. Griglack simply decided
13 “not [to] include ... that vehicle,” which necessarily means his calculated GIC
14 premium was too low. Griglack Dep. II at 142:4–21. For policyholders with numbers
15 of conviction points or at-fault accidents that he deemed too high, he just lowered them
16 arbitrarily. *Id.* at 164:15–165:8; 168:10–169:9 (if he had not lowered them, the GIC
17 premium would have been less than the United Services premium). For entries with a
18 marital status of “0” (which would not compute in his model), Mr. Griglack randomly
19 assigned a value of “1” because it was the most common entry across the data pool.
20 *Id.* at 200:16–22; 202:18–22. He made these decisions because “having to fix each
21 individual” supposed data error “would be unreasonable.” *Id.* at 162:4–8. But all of
22 these choices could be wrong—making his calculated premiums wrong as well.

23 Not only did he fail to replicate GIC premiums, his derivations do not reflect
24 what policyholders actually paid—which is the relevant metric to assess injury
25 according to Plaintiffs’ theory. Griglack Dep. II at 57:8–21. And Mr. Griglack cannot
26 explain why he didn’t use policyholders’ payment records for his analysis, given his
27 acknowledgement that those sorts of records would provide an objectively true answer
28

1 about the amount of GIC premium *actually paid* (and would have shed light on the
2 above “data errors”). *See id.* at 155:20–156:4; 226:25–227:6.

3 Also, critically, Mr. Griglack did not—and admittedly *could not*—account for
4 any changes made by policyholders in the six-month periods between each of the eight
5 snapshot dates (such as adding or subtracting vehicles or coverages, or changing one or
6 more coverage limits, getting into an accident or getting a speeding ticket, or moving
7 to a different address). Griglack Dep. II at 59:17–22; 119:3–120:4; 219:20–220:6. He
8 agreed doing so would present an unreasonably large set of calculation problems
9 specific to each policyholder: He “would essentially need all transactions for every
10 policyholder, which doesn’t seem like a reasonable ask, given the amount of
11 transactions that there could be within any time frame.” Liu Decl., Ex. I (“Griglack
12 Dep. I”) at 131:19–132:7. All those transactions can have a significant impact on
13 premiums from one day to the next. Saner Decl. ¶¶ 40–42; *see also* Liu Decl., Ex. F
14 (“Strombom Rebuttal”) ¶¶ 11–17; Ex. G (“Strombom Supplemental Report”) ¶ 5. But
15 neither Mr. Griglack nor Plaintiffs requested this information and Mr. Griglack did not
16 subsequently attempt its analysis. *See generally* Dkt. 119-1.

17 Both named Plaintiffs illustrate this principle. For example, during one six-
18 month period in 2016—that is, in between two theoretical snapshot dates—Plaintiff
19 Castro changed his liability coverage limits and added rideshare gap protection when
20 he began driving for Lyft, which increased his premium by \$174.76; then he changed
21 his liability limits again and removed the rideshare gap protection from one of his
22 vehicles, which reduced his premium by \$18.33; then his premium increased by
23 \$135.28 when his wife no longer qualified for the good-student discount. Liu Decl.,
24 Ex. J (“Castro Dep. Tr.”) at 92:18–98:15. In other periods, Mr. Castro changed the
25 operator information and traded in one vehicle for a new one, which increased his
26 premium by \$131.82; then he changed the operator information again, which reduced
27 his premium by \$68.83; then he moved, which increased his premium by \$271.79. *Id.*
28 at 101:2–105:9. These changes, among many others, meant that Mr. Castro was

1 frequently quoted one premium number at the start of a six-month period, and then
2 actually paid an entirely different amount. Strombom Rebuttal ¶ 12.

3 Plaintiff Coleman also changed her coverage on multiple occasions, causing
4 large swings in her premiums. During one six-month period—again, between two
5 theoretical snapshot dates—she removed a vehicle from her policy, reducing her
6 premium by \$542.13, then added another vehicle to her policy, which increased her
7 premium by \$104.38. Liu Decl., Ex. K (“Coleman Dep. Tr.”) at 144:12–148:20. In
8 another six-month period, Ms. Coleman got into an accident, which increased her
9 premium by \$175.38; then she changed her address to South Dakota, which increased
10 her premium by \$310.03. *Id.* at 151:11–155:10. Just like with Mr. Castro, Ms.
11 Coleman was quoted one number and then paid another. Strombom Rebuttal ¶ 12.

12 Thus, rather than rely on evidence of what policyholders actually paid, Mr.
13 Griglack employs a flawed shortcut method to derive this number. This leaves
14 Plaintiffs with an inherently inaccurate first half of their **A** minus **B** calculation.

15 2. Calculating Variable B: What policyholders should have paid.

16 The other half of the equation—variable **B**—is the amount of premium,
17 according to Plaintiffs, they and other GIC policyholders *should have* paid for
18 coverage. Mr. Griglack calculated, for the same eight dates, “what [United Services]
19 would have charged” each policyholder. Dkt. 119-1 ¶¶ 4–5. He did so by taking
20 existing United Services base rates and relativities and applying them to current GIC
21 policyholders, as if those policyholders were actually insured by United Services
22 instead of GIC. *Id.* ¶ 30. Subtracting that notional United Services premium from the
23 GIC premium derived by Mr. Griglack supposedly tells us whether any particular
24 policyholder was injured (i.e., if the difference yields a positive number) and if so, the
25 amount of damages. *Id.*

26 Using that formula and the eight snapshot dates, Mr. Griglack concludes that
27 93.8% of all GIC policyholders “paid more as GIC insureds than they would have as
28 USAA insureds.” Dkt. 119-1 ¶ 9. So by his own estimation, 6.2% of GIC

1 policyholders were *better off* as GIC policyholders and thus suffered no harm under
2 Plaintiffs’ theory of the case. And nearly a quarter of the class (22.8%) paid an amount
3 within 10% of what he claims they should have paid. Liu Decl., Ex. N (“Ex. 1 to
4 Griglack Report”).

5 Like Mr. Griglack, Mr. Schwartz tries to calculate “the difference between the
6 insurance premiums charged to the Plaintiffs by the Defendant GIC [variable **A**]
7 compared to what the appropriate premium should be consistent with actuarial and
8 insurance practices and consistent with the appli[c]able law [variable **B**].” Dkt. 58-4
9 ¶ 16; Dkt. 119-3 ¶ 15. He therefore defines damages as “Actual Charged Premium –
10 Required Premium,” where “[t]he Actual Charged Premium would be the actual
11 premium charged by the Defendants to the Plaintiff” and “[t]he Required Premium is
12 the premium necessary to comply with the applicable law.” Dkt. 58-4 ¶ 17.

13 This is just a more complicated way of expressing the “A minus B” equation
14 discussed throughout this brief. Mr. Schwartz piggybacks on Mr. Griglack’s analysis
15 as to both halves of this simple equation. Dkt. 119-3 ¶ 24; Liu Decl., Ex. L (“Schwartz
16 Dep. II”) at 14:20–22; 91:14–25.

17 Mr. Schwartz does not have the correct amount for the **A** variable (Actual
18 Charged Premium), nor could he; Griglack did not calculate it. That leaves him with
19 only Mr. Griglack’s derivation of the “actual” premium charged to each GIC
20 policyholders based on the estimates at each of the eight snapshot dates. Schwartz
21 Dep. II at 91:14–25.

22 Mr. Schwartz offers two core methods of calculating the **B** variable (Required
23 Premium). The first is simply to rely on Mr. Griglack’s calculation of what the
24 corresponding United Services rate would be for the eight snapshot dates. Dkt. 58-4
25 ¶¶ 19–20; Dkt. 119-3 ¶¶ 6, 8–9; Schwartz Dep. II at 137:9–22. The second method is
26 the first with a twist. Mr. Schwartz wants to account for the problem that if GIC
27 charged policyholders less, United Services would have to charge policyholders more;
28 otherwise, there would be a premium shortfall across the two companies. Dkt. 58-4

1 ¶¶ 21–24; Dkt. 119-3 ¶¶ 19–23. So he proposes multiplying Mr. Griglack’s notional
2 United Services rates by an adjustment factor. Schwartz Dep. II at 140:14–141:17.

3 Mr. Schwartz acknowledges that both of these methods of calculating what a
4 notional United Services premium would be depend on Mr. Griglack’s analysis, and
5 that he has no other way of calculating it. Schwartz Dep. II at 14:20–22; 91:14–25.
6 One of the methods is just to use Mr. Griglack’s figures, and the other is to multiply
7 those figures by an adjustment factor. *Id.* at 137:9–22; 140:14–141:17. So, either way,
8 the “central issue in the damage formula” is whether Mr. Griglack’s calculation of a
9 notional United Services rate is correct. Dkt. 119-3 ¶ 16.

10 **III. LEGAL STANDARD**

11 “In a class proceeding, defendants may challenge the reliability of an expert’s
12 evidence under *Daubert* . . . and Rule 702 of the Federal Rules of Evidence.” *Olean*
13 *Wholesale Grocery Coop., Inc. v. Bumble Bee Foods LLC*, 31 F.4th 651, 665 n.7 (9th
14 Cir. 2022) (en banc). To be admissible, expert evidence must be “not only relevant,
15 but reliable.” *Kumho Tire Co. v. Carmichael*, 526 U.S. 137, 147 (1999). Testimony is
16 reliable if it is “based on sufficient facts or data,” it “is the product of reliable
17 principles and methods,” and “the expert has reliably applied the principles and
18 methods to the facts of the case.” Fed. R. Evid. 702. “[I]f an expert’s opinion would
19 not be admissible at trial, it should not pave the way for certifying a proposed class.”
20 *Prantil v. Arkema Inc.*, 986 F.3d 570, 576 (5th Cir. 2021). “[A] district court abdicates
21 its gatekeeping role, and necessarily abuses its discretion, when it makes no reliability
22 findings.” *United States v. Valencia-Lopez*, 971 F.3d 891, 898 (9th Cir. 2020).

23 **IV. ARGUMENT**

24 Plaintiffs’ experts set out to compare the premiums GIC policyholders actually
25 paid against premiums that, under Plaintiffs’ theory, they should have paid, and thus to
26 determine who is injured and the extent of any such injury. Dkt. 119-1 ¶¶ 4–5;
27 Dkt. 119-3 ¶ 5. The inquiry boils down to a simple formula: the actual premiums
28 charged (variable **A**) minus the premiums that should have been charged (variable **B**).

1 The trouble with these experts’ analysis is that they didn’t come up with a
 2 reliable method of determining *either* of those numbers. Instead of using the actual
 3 amounts charged to GIC policyholders, Mr. Griglack attempted to *derive* that amount
 4 with estimates on a handful of “snapshots” over the class period. Dkt. 119-1 ¶¶ 11–12.
 5 And instead of figuring out what the rates of GIC policyholders would be in the only
 6 counterfactual world that is consistent with Plaintiffs’ liability theory, the law, and how
 7 ratemaking actually works—namely, a world in which USAA combines the GIC and
 8 United Services policyholders and then calculates a new set of rates to account for that
 9 combined risk pool—Mr. Griglack slaps the existing United Services rates and
 10 relativities onto GIC policyholders and calls it a day. *Id.* ¶¶ 30–31. Mr. Schwartz then
 11 proposes subtracting one figure from the other to arrive at notional damages. Dkt. 58-
 12 4 ¶ 17; Dkt. 119-3 ¶¶ 6, 8–9.

13 Messrs. Griglack and Schwartz aren’t calculating the difference between what
 14 GIC policyholders actually paid and the amount they should have paid in any plausible
 15 counterfactual world. Because these experts cannot reliably determine whether or to
 16 what extent any policyholder was injured, the Court should exclude their declarations
 17 and testimony.

18 **A. Messrs. Griglack and Schwartz have no reliable method of**
 19 **calculating what GIC policyholders actually paid for insurance.**

20 Mr. Schwartz’s formula for calculating damages is “Actual Charged Premium –
 21 Required Premium,” where “[t]he Actual Charged Premium would be the *actual*
 22 *premium* charged by the Defendants to the Plaintiff.” Dkt. 58-4 ¶ 17 (emphasis
 23 added); Dkt. 119-3 ¶ 6. But there is nothing “actual” in the numbers that Mr. Schwartz
 24 is calculating. He takes the figures from Mr. Griglack, who did not calculate the
 25 premiums *actually paid by* (or even billed to) GIC policyholders. Griglack Dep. II at
 26 155:20–156:4; 226:25–227:6; Strombom Rebuttal ¶¶ 11, 13. Instead, Mr. Griglack
 27 proposes “deriv[ing]” those amounts for each policyholder based on eight snapshot
 28 dates. Dkt. 119-1 ¶¶ 12, 26. In other words, even though the premise of Mr.

1 Schwartz’s model is that he will start with a known, “actual” amount of premium paid
2 by each policyholder, he instead starts with a reconstruction of that amount.

3 That reconstruction is unreliable. Mr. Griglack tried to reverse-engineer what
4 GIC must have charged each policyholder based on their risk profile on eight arbitrary
5 days over approximately three years. Dkt. 119-1 ¶¶ 12, 26. That’s a few drops in an
6 ocean—just 0.5% of the period. This infrequent sampling might not be a problem if
7 policyholders rarely changed their coverage or if their risk profiles rarely changed.
8 But as Plaintiffs themselves illustrate, policyholders change their coverage and risk
9 profiles all the time. Saner Decl. ¶¶ 40–41. Policyholders’ “*quoted* six-month
10 premium on October 1, 2019—which is all that Mr. Griglack is attempting to
11 calculate—does not necessarily reflect what their actual out-of-pocket premium cost
12 would have been for the six-month period between October 1, 2019, and March 31,
13 2019.” *Id.* ¶ 42; *see* Griglack Dep. II at 59:17–22; Strombom Rebuttal ¶¶ 11–17;
14 Strombom Supplemental Report ¶ 5.

15 It isn’t hard to see why Mr. Griglack’s methodology yields an arbitrary and
16 unreliable result. Consider a simplified example with two snapshots over a year-long
17 period (which is roughly the sampling frequency Mr. Griglack proposes). Suppose the
18 policyholder, like Castro, decides to start driving for Lyft just before the first snapshot,
19 so he adds rideshare gap protection coverage and adjusts his liability limits, increasing
20 his premium by 15%, but thinks better of it a month later. Castro Dep. Tr. at 90:13–
21 92:17, 95:8–96:24. Mr. Griglack would count that increased premium for *six times* its
22 actual duration. *See* Griglack Dep. I at 101:14–105:1, 131:19–132:9.

23 Mr. Griglack’s failure to account for mid-policy changes creates fundamental
24 reliability issues. Defendants’ damages expert (Dr. Bruce Strombom) analyzed Mr.
25 Castro’s and Ms. Coleman’s payment records—he found that 63% of their policies had
26 at least one policy adjustment that affected the policy premium during the six-month
27 policy period so that the initial premium (*i.e.*, the premium as of the effective date of
28 the policy) “was *not* equal to the total premium actually paid by the policyholder.” Liu

1 Decl., Ex. E (“Strombom Report”) ¶ 24. When compared to Mr. Griglack’s derived
 2 premiums for the named Plaintiffs, the net error for Mr. Castro’s policies is 7.4% (or
 3 \$977.58) and for Mr. Coleman’s policies is 4.1% (or \$546.14). *Id.* ¶ 25. Dr.
 4 Strombom also analyzed a random sample of 400 GIC policyholders and determined
 5 14.5% had intra-period policy cancellations. Strombom Rebuttal ¶ 14. When
 6 factoring in *both* intra-period changes to rating characteristics and policy cancellations,
 7 the average error from applying Mr. Griglack’s methodology is 6.1% and ranges up to
 8 8.7%. Mr. Griglack’s flawed methodology cannot be relied on to accurately identify
 9 injured class-members or the amount of damages. Strombom Report ¶¶ 25–26; *see*
 10 *also* Watkins Report pp. 20–22 (explaining that Mr. Griglack’s distinction between
 11 injured and uninjured policyholders “become[s] arbitrary and meaningless if based on
 12 Griglack’s short-cut hypothetical calculation using partial data”).

13 Mr. Griglack’s failure to account for policyholders’ mid-policy changes is also
 14 compounded by the fact that some of the rating factors have different weights under
 15 GIC versus United Services. So certain mid-policy changes affect the actual and but-
 16 for premiums to different degrees, meaning they could cause the premium under
 17 United Services’ rates to exceed the GIC premium. Watkins Report pp. 9–10.

18 This isn’t the first case in which an expert has proposed using something like
 19 Mr. Griglack’s inaccurate “derivation” when he might instead have relied on actual
 20 data. And in those other cases, courts have consistently excluded expert testimony as
 21 unreliable. For example:

- 22 • In *Finjan, Inc. v. ESET, LLC*, 2019 WL 5212394 (S.D. Cal. Oct. 16, 2019),
 23 this Court excluded an expert’s testimony because he proposed substituting
 24 his own cost model for actual costs. *Id.* at *4. “Such modeling may be of
 25 assistance when actual costs cannot be determined, but that is not the
 26 situation here”—which makes a “hypothetical construction” of costs “facially
 27 unreasonable.” *Id.* The notional figures would “be confusing and misleading
 28 to the jury, prejudicial to the defendant, and a waste of time.” *Id.*

- 1 • In *Concord Boat Corp. v. Brunswick Corp.*, 207 F.3d 1039, 1056 (8th Cir.
2 2000), the court explained that “[e]ven a theory that might meet certain
3 *Daubert factors* . . . should not be admitted if it does not apply to the specific
4 facts of the case.” *Id.* at 1056. There, an economist constructed a
5 hypothetical model that did not account for the “actual price at which [the
6 defendant’s] engines were sold.” *Id.* His opinion was insufficiently
7 connected to the facts of the case to be reliable. “Expert testimony is useful
8 as a guide to interpreting market facts, but it is not a substitute for them.” *Id.*
9 at 1057.
- 10 • In *Montgomery County v. Microvote Corp.*, 320 F.3d 440 (3d Cir. 2003), the
11 Third Circuit upheld the exclusion of an expert’s testimony about voting
12 machines because he didn’t rely on “actual election use data” in evaluating
13 whether the defendants’ machines had malfunctioned. *Id.* at 448–49.
- 14 • Similarly, in *Guidroz-Brault v. Missouri Pacific Railroad Co.*, 254 F.3d 825
15 (9th Cir. 2001), an expert was indisputably qualified to testify about the
16 general practices of train engineers, but had no basis for testifying about the
17 particular facts of the case—specifically, whether an engineer should have
18 detected the sabotage that derailed a train in the Arizona desert. *Id.* at 831.
- 19 • It was much the same story in *Nelson v. Tennessee Gas Pipeline Co.*, 243
20 F.3d 244 (6th Cir. 2001). There, too, the expert was abundantly qualified to
21 testify, but his opinion was inadmissible because it wasn’t based on real data.
22 *Id.* at 254. He “admitted no knowledge concerning the actual exposure of the
23 seven plaintiffs” to the chemical they claimed had harmed them “or the
24 temporal relationship between their exposure and symptoms.” *Id.*

25 Further, an expert has to rely on not only the actual data, but *enough* actual data.
26 Liu Decl., Ex. D (“Strombom Decl.”) ¶ 16. Here, Mr. Griglack relies on a mere
27 derivation of the price paid by GIC policyholders for only eight “snapshots” over a
28 period of approximately three years. Dkt. 119-1 ¶¶ 11–12. An expert must “consider[]

1 sufficient data to employ the [proposed] methodology.” *Gopalratnam v. Hewlett-*
2 *Packard Co.*, 877 F.3d 771, 781 (7th Cir. 2017). So, for example, “an opinion about an
3 average gross sales price . . . could not be reliably supported by evidence relating to
4 sales to only one customer.” *Id.*; see also, e.g., *Paz v. Brush Engineered Materials,*
5 *Inc.*, 555 F.3d 383, 389 (5th Cir. 2009) (expert testimony premised on “insufficient
6 information” was “unreliable” and “properly excluded”). After all, “[t]he fairness and
7 utility” of sampling depends “on facts and circumstances particular” to each case, and
8 the Supreme Court has emphasized that “[r]epresentative evidence that is statistically
9 inadequate or based on implausible assumptions could not lead to a fair or accurate
10 estimate” of what plaintiffs are trying to prove. *Tyson Foods, Inc. v. Bouaphakeo*, 577
11 U.S. 442, 459–60 (2016).

12 Simply put, Mr. Griglack uses an unreliable model based on incomplete
13 information for actual values. He and Mr. Schwartz thus lack any sound basis for
14 reporting how much GIC policyholders actually paid for their insurance.

15 **B. Messrs. Griglack and Schwartz also have no reliable method of**
16 **calculating what GIC policyholders would have paid in a plausible**
17 **counterfactual world.**

18 The second half of the experts’ calculation—the “B” variable, or the amount of
19 premium GIC policyholders *should have* paid under Plaintiffs’ theory—is even more
20 arbitrary than the first. Plaintiffs contend the rates charged to GIC policyholders were
21 unfairly higher than those charged to United Services policyholders. So Mr. Griglack
22 proposes a simple retroactive fix: recalculate GIC policyholders’ premiums by
23 applying United Services’ rates. Dkt. 119-1 ¶¶ 29–31. From there, he says he can tell
24 who is injured—that is, who would be better off with United Services’ rates. And
25 Mr. Schwartz adopts the same proposal for his damages calculations. Dkt. 119-3
26 ¶¶ 20, 25.

27 This oversimplified approach is completely unreliable. The experts’ task was to
28 calculate the amount that GIC policyholders actually would have paid in a

1 counterfactual world where GIC and United Services did not engage in the conduct
2 Plaintiffs claim was unlawful. In other words, what would class members’ premiums
3 have been if Defendants charged the same rates to military officers and enlisted
4 personnel? Messrs. Griglack and Schwartz didn’t even try to answer that question.

5 They instead propose taking known quantities—the United Services base rates
6 and relativities—and applying them to each GIC policyholder. But this counterfactual
7 world is *impossible and unlawful* as an actuarial and regulatory matter. Weschler Decl.
8 ¶¶ 34, 36; Liu Decl., Ex. A (“Watkins Decl.”) ¶¶ 34–35. “[U]nder Proposition 103,
9 auto insurance companies in California—including the USAA companies—can charge
10 only those rates that have received prior approval” from the Department of Insurance.
11 Weschler Decl. ¶ 22; *see also* Watkins Report p. 4; Cal. Ins. Code § 1858.07(a)
12 (providing for a civil penalty if an insurer uses rates *other than* the ones the
13 Department previously approved).

14 When insurers seek to change their rates, they must use the Department’s
15 formulas to determine the range of permissible rate changes based on the risk profile of
16 the specific group of policyholders. Weschler Decl. ¶¶ 26, 36; *see* Watkins Decl.
17 ¶¶ 22–27. The insurer then submits a rate application to the Department, which
18 determines whether the proposed rates are “excessive, inadequate, or unfairly
19 discriminatory.” Watkins Decl. ¶ 19. The Department “plays a very active role in
20 reviewing and commenting on proposed rates” and often requires further changes
21 before approving proposed rates. Weschler Decl. ¶ 27.

22 Accordingly, Mr. Griglack’s counterfactual model depends on the premise that
23 GIC would have violated the Insurance Code and actuarial principles by applying
24 United Services’ rates to GIC policyholders, even though those rates were created for
25 an entirely different risk pool and the Department has not approved those rates for GIC
26 policyholders. Weschler Decl. ¶¶ 34, 36; Watkins Decl. ¶¶ 34–35.

27 Mr. Griglack understands that “in all likelihood” it is not actuarially appropriate
28 for one company to calculate its premiums by looking to another company’s rates and

1 relativities “unless they had similar experience.” Griglack Dep. II at 110:20–111:4.
2 He agrees that Plaintiffs’ damages model does not reflect reality—if GIC wanted to
3 charge the same rates as United Services, it would have to demonstrate to CDI “why
4 they would be using the same base rates and relativities based upon their experience,”
5 and that GIC’s loss ratios and historical loss experience likely dictated its higher base
6 rates. *Id.* at 112:23–114:12.

7 As for Mr. Schwartz, he made clear that his own understanding of the relevant
8 law was not the basis for his testimony. He was instead willing to accept *any*
9 interpretation of the law that Plaintiffs’ counsel might give him, no matter how absurd.
10 Liu Decl., Ex. M (“Schwartz Dep. I”) at 25:3–26:5. For example, even if Plaintiffs’
11 counsel asked Mr. Schwartz to assume that all GIC policyholders should receive *free*
12 insurance, he said he would vouch for a model premised on that interpretation as
13 “actuarially sound.” *Id.* at 26:7–16. An expert’s reliance on such unsupported
14 assumptions renders an expert’s class-wide damages model unreliable. *See Olean*
15 *Wholesale Grocery Coop., Inc.*, 31 F.4th at 666 n.9 (citing *In re New Motor Vehicles*
16 *Canadian Exp. Antitrust Litig.*, 522 F.3d 6, 29 (1st Cir. 2008) (vacating class
17 certification where damages expert relied on unsupported assumption that all
18 consumers would have paid more for cars if national prices increased)).

19 In the counterfactual world that Plaintiffs should have been analyzing, GIC
20 policyholders’ premiums wouldn’t be calculated using United Services’ base rates and
21 relativities. Instead, the GIC policyholders’ premiums would have to be calculated
22 using a brand-new set of rates and relativities, based on the Department’s set formulas,
23 that could be applied across the board to all members of the military community
24 insured by United Services and GIC. Wechsler Decl. ¶ 38; Watkins Decl. ¶¶ 36–39.
25 Those rates and relativities would almost certainly be different from both GIC’s and
26 United Services’ current rates and relativities. Griglack Dep. I at 82:23–83:12;
27 Watkins Decl. ¶ 39; Strombom Decl. ¶ 18.

28

1 To even begin to attack the problem, Messrs. Griglack and Schwartz should
2 have therefore (1) combined all California GIC policyholders (or just a subset, like the
3 statutory “good drivers”) and United Services policyholders into a new company,
4 (2) recalculated the base rates and relativities for that combined insured pool based on
5 that pool’s risk factors, and then (3) applied those rates and relativities to calculate a
6 premium for each policyholder. Wechsler Decl. ¶ 38; Watkins Decl. ¶¶ 36–39. That
7 approach would still present significant practical issues and would depend on various
8 assumptions—including the assumption the Insurance Department would allow such a
9 fundamental corporate restructuring and approve the proposed rates and that a large
10 number of customers wouldn’t switch to other insurers as a result of premium changes.
11 See Wechsler Decl. ¶ 38. But it would at least account for the undeniable reality that
12 rates are always constructed from a specific risk pool to cover a specific amount of
13 expected claims—and therefore can’t be transposed from one risk pool onto another.

14 So, Messrs. Griglack and Schwartz are proposing a counterfactual world that
15 couldn’t exist—either logically or legally. Courts have consistently excluded expert
16 analysis that depends on an impossible counterfactual. For example:

- 17 • In *Oracle America, Inc. v. Google Inc.*, 2012 WL 850705 (N.D. Cal. Mar. 13,
18 2012), Oracle sued Google for allegedly infringing its software patents in
19 Android phones. Oracle’s expert set out to determine how much more
20 market share Android had taken as a result of the infringement. *Id.* at *12.
21 (The alleged infringement supposedly made the phones faster.) The expert
22 “assumed that the sales prices of Android smartphones . . . would remain
23 constant even though he had previously determined that [consumers] would
24 be less willing to pay for a slower Android.” *Id.* In other words, his analysis
25 did not mesh with “the counterfactual with a slower Android smartphone.”
26 *Id.* The court therefore excluded the expert’s opinion. *Id.* at *13.
- 27 • In *Helft v. Allmerica Financial Life Insurance & Annuity Company*, 2009 WL
28 815451 (N.D.N.Y. Mar. 26, 2009), the plaintiffs sued their insurance

1 company for limiting their trading activity in investment accounts connected
2 to life-insurance policies. *Id.* at *1. Their experts claimed that absent these
3 restrictions, the plaintiffs could have reaped huge investment returns, *id.* at
4 *9–10, but the court excluded the testimony because the experts “ignore[d]
5 the actual investment environment in which plaintiffs’ hypothetical post-
6 restriction trades would have taken place.” *Id.* at *13. The experts “failed to
7 demonstrate that the trades they ha[d] predicted and the resulting ‘but-for’
8 trading volumes could have actually taken place.” *Id.* at *15. That the
9 experts’ opinion depended on an implausible counterfactual world meant that
10 it was “not based on sufficient facts or data to be reliable” and “use[d] an
11 unreliable methodology.” *Id.* at *16.

- 12 • In *DSU Medical Corp. v. JMS Co.*, 296 F. Supp. 2d 1140 (N.D. Cal 2003), a
13 patent-infringement case, the plaintiff’s expert opined that absent
14 infringement the parties would have entered into a hypothetical contract that
15 was far longer and more expensive on a per-unit basis than the parties’ earlier
16 deals. *Id.* at 1158. The court excluded the opinion, explaining that it was
17 divorced from “economic reality.” *Id.* The Federal Circuit upheld the
18 exclusion, explaining that “[w]hile damages analysis invariably involves
19 hypothetical reconstruction of a ‘but for’ marketplace, that reconstruction
20 must include some footing in economic principle, which the trial court found
21 lacking.” *DSU Med. Corp. v. JMS Co.*, 471 F.3d 1293, 1309 (Fed. Cir. 2006).
- 22 • And in *Ask Chemicals, LP v. Computer Packages, Inc.*, 593 F. App’x 506
23 (6th Cir. 2014), the Sixth Circuit upheld the exclusion of an expert who
24 projected the plaintiff’s lost profits based on documents from the defendant
25 that were many years out of date and related to the wrong market. *Id.* at 510.
26 Accordingly, “any projection or calculation made by [the expert] of future
27 lost profits would . . . involve ‘too great an analytical leap.’” *Id.*

1 Mr. Schwartz appears to recognize that a completely static model makes no
2 sense—that the model shouldn’t begin and end with the assignment of United Services’
3 rates and relativities to GIC policyholders, as his first model and Mr. Griglack both do.
4 That’s why he offers a second model, through which he proposes accounting for the
5 decline in GIC premium revenue (from lower rates charged to GIC policyholders) with
6 an offsetting increase in United Services’ revenue (from higher rates charged to United
7 Services’ policyholders). Dkt. 119-3 ¶¶ 19–23. He does this even though he
8 acknowledges it’d be impossible to collect anything retroactively from United Services
9 policyholders to make up the difference. Schwartz Dep. II at 142:4–13; *see* Liu Decl.,
10 Ex. C (“Watkins Rebuttal”) p. 10 (noting that Schwartz’s alternative damages model
11 “does not actually ‘balance’ the overall premium since there is no way to go back and
12 charge the adjusted United Services rates to anyone other than GIC members”).

13 This second model depends completely on the first; Mr. Schwartz does nothing
14 more than multiply the rates calculated by Mr. Griglack by a fudge factor ostensibly
15 accounting for the problem that charging GIC policyholders less in a vacuum would
16 leave United Services and GIC together without sufficient premium revenue to cover
17 their claims liabilities. But there is too big a gap between the first model and the
18 counterfactual world it should have been designed to address—one in which two risk
19 pools were combined and rates calculated afresh—and the Band-Aid of the second
20 model is not enough to bridge it.

21 Again, to calculate the “but-for” premiums for each GIC policyholder,
22 Messrs. Griglack and Schwartz should have combined the risk pools of GIC (or just
23 the statutory “good drivers” from GIC) and United Services and calculated new rates
24 for the combined group of policyholders from scratch. Wechsler Decl. ¶ 38; Watkins
25 Decl. ¶¶ 36–39. Instead, they propose applying the existing United Services rates to
26 the GIC risk pool—and papering over the obvious premium revenue shortfall on the
27 back end. That proposal bears no relation to the counterfactual world implied by
28 Plaintiffs’ claims.

1 When an expert’s analysis requires positing a counterfactual world, that world
 2 must at least be *possible*. The one posited by Messrs. Griglack and Schwartz isn’t.
 3 For that reason, their model is not just inaccurate, but fundamentally *unreliable*—
 4 “connected to existing data only by the *ipse dixit* of the expert[s].” *Gen. Elec. Co. v.*
 5 *Joiner*, 522 U.S. 136, 146 (1997).

6 **C. Because both variables in the experts’ analysis are unreliable, the**
 7 **resulting model yields arbitrary results.**

8 An expert’s analysis must be reliable “at every step”; so “any step that renders
 9 the analysis unreliable under the *Daubert* factors renders the expert’s testimony
 10 inadmissible.” *Amorgianos v. Nat’l R.R. Passenger Corp.*, 303 F.3d 256, 267 (2d Cir.
 11 2002). Here, the analysis of Messrs. Griglack and Schwartz is unreliable from start to
 12 finish. The calculation supposedly revealing whether and to what extent GIC
 13 policyholders were injured has only two variables, and they don’t have a reliable
 14 method of calculating either. As a result, they cannot reliably say whether many or
 15 even most policyholders were injured by the conduct Plaintiffs claim was unlawful.

16 Mr. Griglack’s report reveals that the margin for error in his model is low. He
 17 includes a table showing “the percent difference between the calculated USAA
 18 premiums and the calculated GIC premiums”:

19 **Total (12/28/2017-9/30/2021)**

20 Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
21 GIC > USAA 20% or more	44.8%	42.6%	39.9%
22 GIC > USAA 10%-20%	38.5%	39.9%	36.4%
23 GIC > USAA 0%-10%	13.8%	14.4%	17.5%
24 USAA > GIC 0%-10%	2.7%	2.8%	5.3%
USAA > GIC 10%-20%	0.2%	0.2%	0.8%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

25
 26 Ex. 1 to Griglack Report. The bottom three rows show that, even according to
 27 Mr. Griglack, one in every sixteen GIC policyholders wasn’t injured (that is, didn’t pay
 28 more for insurance from GIC than he or she would have paid for insurance from

1 United Services under Mr. Griglack’s assumptions). And the middle two rows show
2 that nearly a fourth of GIC policyholders (22.8%) paid within 10% of the amount Mr.
3 Griglack says they should have paid. That means that even modest systematic errors in
4 Mr. Griglack’s analysis could result in Plaintiffs treating uninjured policyholders as
5 injured and vice versa. *See* Strombom Report ¶ 25.

6 **V. CONCLUSION**

7 The Court should exclude the reports and testimony of Messrs. Griglack
8 and Schwartz.

9
10 Dated: July 21, 2023

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10
11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA

13
14 EILEEN-GAYLE COLEMAN, and
15 ROBERT CASTRO, on behalf of
themselves and all others similarly
16 situated,

17 Plaintiffs,

18 v.

19 UNITED SERVICES AUTOMOBILE
ASSOCIATION and USAA GENERAL
INDEMNITY COMPANY,

20 Defendants.
21
22
23

CASE NO. 3:21-cv-00217-RSH-KSC

**DECLARATION OF ADRIENNE LIU
IN SUPPORT OF (1) DEFENDANTS'
MOTION TO EXCLUDE THE
DECLARATIONS AND TESTIMONY
OF JONATHAN GRIGLACK AND
ALLAN SCHWARTZ AND
(2) DEFENDANTS' OPPOSITION TO
PLAINTIFFS' RENEWED MOTION
FOR CLASS CERTIFICATION**

Judge: Hon. Robert S. Huie
Action Filed: February 4, 2021

PER CHAMBERS RULES, NO ORAL
ARGUMENT UNLESS SEPARATELY
ORDERED BY THE COURT

DECLARATION OF ADRIENNE LIU

I, Adrienne Liu, declare as follows:

1. I am an attorney admitted to practice law in the State of California and before this Court. I am an attorney in the law firm of Gibson, Dunn, & Crutcher LLP, and I am one of the attorneys responsible for the representation of Defendants United Services Automobile Association and USAA General Indemnity Company in the above-referenced action. I submit this declaration in support of Defendants’ Motion to Exclude the Declaration and Testimony of Jonathan Griglack and Allan Schwartz and Defendants’ Opposition to Plaintiffs’ Motion for Class Certification. Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently to these facts.

2. I have reviewed the expert report of Allan Schwartz and the accompanying backup files, including spreadsheets that show Mr. Schwartz’s calculations for each policyholder.

3. For Plaintiff Castro, Mr. Schwartz stated he paid \$641.19 in GIC premium and would have paid \$508.08 had his policy been written in United Services (both numbers were derived and provided by Plaintiffs’ other expert, Mr. Jonathan Griglack) for the March 2021 snapshot date.

4. For Plaintiff Coleman (who insured two vehicles through GIC), Mr. Schwartz stated she paid \$1,467.33 in GIC premium for the March 2018 snapshot date.

5. Attached as Exhibit A is a true and correct copy of the declaration of Nancy Watkins, FCAS, MAAA (and accompanying exhibits), dated June 1, 2022.

6. Attached as Exhibit B is a true and correct copy of the report of Nancy Watkins, FCAS, MAAA (and accompanying exhibits), dated October 17, 2022.

7. Attached as Exhibit C is a true and correct copy of the rebuttal report of Nancy Watkins, FCAS, MAAA (and accompanying exhibits), dated December 2, 2022.

8. Attached as Exhibit D is a true and correct copy of the declaration of

1 Bruce A. Strobom, Ph.D. (and accompanying exhibits), dated June 2, 2022.

2 9. Attached as Exhibit E is a true and correct copy of the report of Bruce A.
3 Strobom, Ph.D. (and accompanying exhibits), dated October 17, 2022.

4 10. Attached as Exhibit F is a true and correct copy of the rebuttal report of
5 Bruce A. Strobom, Ph.D. (and accompanying exhibits), dated December 2, 2022.

6 11. Attached as Exhibit G is a true and correct copy of the supplemental
7 report of Bruce A. Strobom, Ph.D. (and accompanying exhibits), dated March 3,
8 2023.

9 12. Attached as Exhibit H is a true and correct copy of excerpts of the
10 transcript of the deposition of Jonathan Griglack, taken in this matter on January 11,
11 2023.

12 13. Attached as Exhibit I is a true and correct copy of excerpts of the
13 transcript of the deposition of Jonathan Griglack, taken in this matter on April 16,
14 2022.

15 14. Attached as Exhibit J is a true and correct copy of excerpts of the
16 transcript of the deposition of Plaintiff Robert Castro, taken in this matter on April 18,
17 2022.

18 15. Attached as Exhibit K is a true and correct copy of excerpts of the
19 transcript of the deposition of Plaintiff Eileen-Gayle Coleman, taken in this matter on
20 April 13, 2022.

21 16. Attached as Exhibit L is a true and correct copy of excerpts of the
22 transcript of the deposition of Allan Schwartz, taken in this matter on February 23,
23 2023.

24 17. Attached as Exhibit M is a true and correct copy of excerpts of the
25 transcript of the deposition of Allan Schwartz, taken in this matter on May 18, 2022.

26 18. Attached as Exhibit N is a true and correct copy of Exhibit 1 to the Report
27 of Jonathan Griglack, dated October 17, 2022.

28 //

1 I declare under the penalty of perjury under the laws of the United States and the
2 State of California that the foregoing is true and correct, and that I executed this
3 Declaration in Los Angeles, California.

4
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6 Dated: July 21, 2023

/s/ Adrienne Liu

Adrienne Liu

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EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

EILEEN-GAYLE COLEMAN and
ROBERT CASTRO, on behalf of
themselves and all others similarly
situated,

Case No. 3:21-cv-217-CAB-LL

Plaintiffs,

v.

UNITED SERVICES AUTOMOBILE
ASSOCIATION and USAA GENERAL
INDEMNITY COMPANY

Defendants.

DECLARATION OF NANCY WATKINS

Qualifications

1. My name is Nancy Watkins, and my business address is 650 California Street, San Francisco, California. I am a Principal and Consulting Actuary with Milliman, Inc. (“Milliman”). I am a Fellow of the Casualty Actuarial Society (“CAS”) and a Member of the American Academy of Actuaries (“AAA”).

2. Milliman is among the world’s largest providers of actuarial, risk management, and related technology and data solutions. Milliman’s consulting and advanced analytics capabilities encompass healthcare, property and casualty insurance, life insurance and financial services, and employee benefits. With more than 4,500 employees in 2022, the firm serves the full spectrum of business, financial, government, union, education, nonprofit organizations. Founded in 1947, Milliman today has offices in principal cities worldwide, covering markets in North America, Latin America, Europe, Asia and the Pacific, the Middle East, and Africa.

3. A complete statement of my education, employment, and academic credentials is included in the curriculum vitae filed as Attachment A with this testimony. To summarize, I have a Bachelor of Science degree in Mathematical Sciences from the University of North Carolina at Chapel Hill. From 1983 to 1986, I was an actuarial student at Aetna Life and Casualty. From 1986 to 1989, I was an actuarial analyst at John Hancock Reinsurance. From 1989 to 1991, I was an actuarial consultant at Price Waterhouse; my title was Senior Manager when I left the company. I was the owner and President of an independent actuarial consulting firm, Watkins Consulting Co., from 1991 to 1997. I joined Milliman 1997 as a Consulting Actuary and was made a Principal in 1999; currently I co-manage a practice of 35 actuaries and professionals in San Francisco.

4. I have been actively involved in professional leadership roles throughout my career. Currently I am a volunteer member of the Climate Insurance Linked Resilient

Infrastructure Finance Working Group of the United Nations Capital Development Fund, piloting climate adaptation financing for emerging markets and least developed countries. I also serve as an advisory board member for The Wharton Risk Center Policy Incubator Initiative.

5. Previously I served on the AAA Flood Insurance Subgroup, in recognition of which I received the AAA Outstanding Volunteerism Award. I also served as Vice-Chair and Chair of the Committee on Property and Liability Financial Reporting, a committee of the AAA that deals with Property and Casualty (“P&C”) financial reporting issues. In this capacity I worked closely with representatives of the National Association of Insurance Commissioners (“NAIC”). I served as chair of the Risk Transfer Subgroup, to provide technical assistance to regulators, standard-setters, and other governing bodies as necessary in the risk transfer area. I also chaired the Risk Transfer Work Group, a group that contains actuaries from the industry as well as representatives from the Big 4 accounting firms and regulators from the New York Insurance Department. During that time, I also served as a member of the AAA Financial Reporting Council and Casualty Practice Council and co-chaired the AAA Best Estimates Working Group. In recognition of these efforts, I received the CAS Above and Beyond Achievement Award.

6. I have presented on technical ratemaking and financial reporting topics at many NAIC meetings as well as meetings of the National Flood Conference, Reinsurance Association of America, International Association of Insurance Receivers, Internal Revenue Service, Securities and Exchange Commission, American Institute of Certified Public Accountants Insurance Expert Panel, and Public Company Accounting Oversight Board.

7. As a consultant, I manage a San Francisco P&C practice that specializes in climate resilience, insurtech, catastrophic property risk, and personal lines insurance. Our consulting services include product pricing and development, litigation support, use of catastrophe models in ratemaking, competitive analysis, predictive modeling, class plan analysis, assistance working with state regulators, reserve reviews, and state expansion strategies. I have submitted and/or worked on hundreds of rate filings in the past 25 years, mostly for residential property and personal automobile insurance.

8. I meet the Qualification Standards of the American Academy of Actuaries to render the opinions contained herein.

9. My 2022 billable rate is \$825 per hour payable to Milliman, Inc. for my actuarial consulting services, including this expert witness support. My payment is not dependent on the outcome of this matter.

Background and Scope of Work

10. I¹ have been asked by counsel for United Services Automobile Association (“USAA” or “United Services”) and USAA General Indemnity Company (“GIC”) to provide expert testimony in the motion for class certification of the matter of Eileen-Gayle Coleman, and Robert Castro, on behalf of themselves and all others similarly situated (“Plaintiffs”) v. United Services Automobile Association and USAA General Indemnity Company (collectively, “Defendants”), Case No. 3:21-cv-00217-CAB-LL, pending in the United States District Court for the Southern District of California.

11. United Services and GIC write Private Passenger Auto (“PPA”) policies in California. Each of the companies insures a different segment of the military, as detailed in Defendants’ California Auto Company Placement Rules (“Placement Rules”) filed with the California Department of Insurance (“CDI”).² Generally speaking, United Services insures higher-ranking officers and enlisted personnel (E-7 and above), and GIC insures lower-ranking officers and enlisted personnel (E-1 through E-6). United Services’ and GIC’s rates have both been reviewed and approved by the CDI.

12. Plaintiffs allege that USAA’s practice of segmenting policyholders according to the Placement Rules -- and then charging higher base rates for GIC compared with United Services -- violates section 1861.16(b) of the California Insurance Code, which requires auto insurers to offer a statutory “good driver” a policy from the insurer with the lowest rates within a commonly-controlled group of companies. Plaintiffs further allege that segmenting policyholders according to the Placement Rules -- and then charging higher base rates for GIC compared with United Services -- discriminates against enlisted personnel based on their military status in violation of California’s anti-discrimination laws.

13. The Plaintiffs seek to certify two classes. One class consists of all active and retired military personnel with ranks E-1 through E-6 who have a California GIC auto insurance policy with Collision coverage, and paid more for that policy than they would have paid in United Services. The second class consists of GIC insureds who have collision coverage from GIC and qualify as statutory “Good Drivers,” and paid more for that policy than they would have paid in United Services. In support of their certification motion, Plaintiffs have submitted calculations by Mr. Jonathan Griglack estimating the proportion of GIC policyholders for whom United Services premiums would have been lower, and doing the same exercise for GIC policyholders with Collision coverage and GIC policyholders who qualify as statutory “good drivers.” Also on behalf of Plaintiffs, Mr. Allan I. Schwartz has proposed to identify injured policyholders and calculate damages using Mr. Griglack’s calculations and asserts that this model can be applied on a class-wide basis.

¹ Throughout this report, references to “I” or “my” are intended to include Milliman employees working under my direction to assist in this assignment, including internal peer reviewers. The opinions stated in this report are my opinions.

² For example, company placement rules were submitted as part of the rate filings USAA-130660589 and USAA-130660642 for United Services and GIC, respectively.

14. I have been asked to provide background information on PPA ratemaking in California and to evaluate, from an actuarial perspective, the findings and opinions provided in the declarations of Mr. Griglack and Mr. Schwartz.

Basis of Analysis

15. My analysis was based on a review of the following data and information. In performing this analysis, I relied upon data and other information provided to me by United Services and GIC, as well as industry sources of data. I did not audit or verify this data and information.

- Plaintiffs' Notice of Motion and Motion for Class Certification
- Declaration of Jonathan Griglack dated 4/6/2022
- Amended Declaration of Jonathan Griglack dated 5/23/2022
- Declaration of Allan I. Schwartz dated 4/7/2022
- Depositions of Plaintiffs Coleman and Castro
- Depositions of Mr. Griglack and Mr. Schwartz
- Excel files from Plaintiff
 - USAA 10-1-19 Results Part 1.xlsx
 - USAA 10-1-19 Results Part 2.xlsx
 - USAA 10-1-19 Results Part 3.xlsx
 - SGRisk Limited 10-2019 Comparisons (Rates from 19-14).xlsx
 - Comparison of Damage Calculations – Response to USAA.xlsx
- Excel files from USAA:
 - 2022.03.25 – Coleman_FullReport.xlsx
 - CA Auto 025574112 09-05-2019 USAA.xlsx
 - CA Auto 25574112 09-05-2019 GIC \$1202.89.xlsx
- Plaintiff Castro policy declaration pages:
 - 17 USAA00000551-552.pdf
 - 16 USAA00000537-539.pdf
 - 15 USAA00000528-530.pdf
 - 13 USAA00000492-493.pdf
- Publicly available California rate filings for United Services and GIC:
 - GIC SERFF filing # USAA-130660642, effective 12/28/2017
 - United Services SERFF filing # USAA-130660589, effective 12/28/2017
 - United Services SERFF filing # USAA-131769162, effective 8/1/2019
- Publicly available California class plan filings for United Services and GIC:
 - GIC SERFF filing # USAA-130660523, effective 12/28/2017
 - United Services SERFF filing #USAA-130660487, effective date 12/28/2017
- California Code of Regulations (“CCR”)
- California Insurance Code (“CIC”)
- California Department of Insurance “Prior Approval Rate Filing Instructions” (http://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0200-prior-approval-factors/upload/PriorAppRateFilingInstr_Ed_01-19-2022.pdf), accessed 4/19/2022

- CAS Statement of Principles Regarding Property and Casualty Insurance Ratemaking (“CAS SOPs”)
- Actuarial Standards of Practice (“ASOPs”):
 - ASOP 12: *Risk Classification (for All Practice Areas)*
 - ASOP 23: *Data Quality*
 - ASOP 25: *Credibility Procedures*
 - ASOP 53: *Estimating Future Costs for Prospective Property/Casualty Risk Transfer and Risk Retention*

Summary of Findings and Opinions

16. A high-level summary of my findings regarding the analysis and opinions contained in the Griglack and Schwartz declarations is as follows:

- Mr. Schwartz’s proposed injury/damage models rest on a fundamentally unsound premise that charging certain GIC customers premiums based on United Services’ rates and class factors would be consistent with sound actuarial practices and applicable law and regulation. It would not.
- Mr. Griglack’s premium calculations are flawed, incomplete, and should not be relied upon. He has not adequately demonstrated that he will be able to produce sufficiently accurate premium calculations to inform Schwartz’s damage models.
- Mr. Griglack’s probability analysis is irrelevant. His analysis is based on an erroneous premise that company placement and the calculation of an insurance premium are random processes. They are not.

Overview of California PPA Ratemaking Process

17. The process of setting insurance prices is referred to as “ratemaking” in the P&C insurance industry. The price the insurance consumer pays is referred to as “premium.” Insurance premiums can vary significantly for groups of insureds with different risk characteristics.

18. Ratemaking is composed of two separate types of analysis – an overall rate level analysis to determine the total premium for the insurer to charge during a prospective period, and a risk classification plan analysis to consider differences in expected risk between individual segments of policyholders. Actuarially sound premiums are determined by (1) an overall amount of premium reasonable to charge for all business within a given program or state, and then (2) a class plan, comprising a rate calculation formula, base rates, and rating factors, that distributes the overall premium across all policyholders based on relative risk.

19. Proposition 103, passed by California voters in November 1988, requires the “prior approval” of the CDI before insurance companies can implement property and casualty insurance rates for all P&C lines of business except life, ocean marine, health, disability, and mortgage insurance. For the non-exempted lines including PPA, insurers prepare rate applications, also known as “filings”, which are sent to the CDI via System for Electronic Rates & Forms Filing (“SERFF”). The CDI’s Rate Regulation Branch reviews these filings and

determines whether the proposed rates are not excessive, inadequate, or unfairly discriminatory. For PPA, the CDI requires a separate filing for each type of analysis, as follows:

- A “rate filing” contains support for proposed changes in the overall total premium. An insurer may also vary the rates by “group”, as described in CIC 1861.12.³ Typically, a separate rate level filing is submitted for each group.
- A “class plan” filing contains support for the rating factors used to vary premiums for policyholders with differences in expected risk.

20. Insurers have the burden of proving the requested rates are justified. If a CDI reviewer requires additional information and/or amendments regarding the proposed rates, they can send an “Objection Letter” to the insurer. The insurer then sends a “Response Letter” with the additional information and/or amendments. For example, the CDI issued numerous objections in the course of its review and approval of recent United Services and GIC filings, as follows:

- United Services rate filing # USAA-131769162: 3 objection letters
- United Services rate filing # USAA-130660589: 7 objection letters
- GIC rate filing # USAA-130660642: 7 objection letters
- GIC class plan filing # USAA-130660523: 7 objection letters

21. Based on their review, the CDI may approve the rates or issue a notice of rate hearing. In practice, most issues are resolved by the described iterative process without a rate hearing.

Setting the Overall PPA Premium

22. Title 10, Chapter 5, Subchapter 4.8, Article 4 of the California Code of Regulations is titled “Determination of Reasonable Rates.” It describes the process and parameters used to calculate the reasonable range of overall premium for a pool of insureds, as follows:

- Projected losses are calculated by adjusting the insurer’s historic losses for catastrophes, loss development, and trend (CCR 2644.4)⁴
- Support for loss development factors must be presented in the filing with the insurer’s historical experience shown in a proscribed fashion (CCR 2644.6)⁵

³ According to CIC 1861.12, “Any insurer may issue any insurance coverage on a group plan, without restriction as to the purpose of the group, occupation or type of group. Group insurance rates shall not be considered to be unfairly discriminatory, if they are averaged broadly among persons insured under the group plan.”

⁴ Per CCR 2644.4(a), “Projected losses” means the insurer’s historic losses per exposure, adjusted by catastrophe adjustment, as prescribed in section 2644.5, by loss development, as prescribed in section 2644.6, and by loss trend, as prescribed in section 2644.7.

⁵ Per CCR 2644.6, loss development shall be presented as a loss-development triangle, based on the dollar-weighted average of the ratios of losses for the three most recent accident-years, policy-years or report-years available for a reporting interval. Filings shall contain both paid losses and case-specific reserves, stated separately. Loss development shall employ either paid losses or the sum of paid losses and case-specific reserves. The insurer shall submit both the factors and ultimate losses or claims for the paid and incurred loss and the reported and the paid claims development calculations, and shall demonstrate that its selection is the most actuarially sound. Loss development data shall exclude catastrophes. Where the loss development factors within a given line significantly

- Support for loss and premium trends must be presented in the filing with the insurer's historical experience shown in a proscribed fashion (CCR 2644.7)⁶
- Support for the credibility assigned to the insurer's historical trend must be presented in the filing with the insurer's historical experience shown in a proscribed fashion (CCR 2644.7)⁷
- Maximum allowable expenses and the minimum and maximum profit provisions are determined by parameters established by the Commissioner (CCR 2644.12, CCR 2644.16)
- The maximum overall premium is the company's projected losses and loss adjustment expenses, adjusted for estimated investment income on reserves and ancillary income, plus provisions for allowable expenses and maximum allowable profit (CCR 2644.2). The minimum permitted premium is calculated similarly (CCR 2644.3).
- According to CCR 2644.1 - Excessive or Inadequate Rates, "No rate shall be approved or remain in effect that is above the maximum permitted earned premium, as defined in section 2644.2, or is below the minimum permitted earned premium, as defined in section 2644.3. Where the Commissioner finds that a rate or proposed rate is excessive or inadequate, the rate or proposed rate shall not be used nor remain in effect."

23. Also, the CDI Prior Approval Rate Filing Instructions⁸ require insurers to provide full rate support for any changes that affect the rate or cost of coverage to any insured. According to the CDI instructions, for all filings requesting changes in rates, rules, or

vary by subline, by size of loss, or by coverage, separate loss development factors shall be calculated in accordance with that evidence.

⁶ Per CCR 2644.7 (b), trend factors shall be based on the exponential curve of best fit. Companies shall file the most recent 8, 12, 16, 20, and 24 quarters of rolling calendar year data excluding catastrophes. The premium and loss trend factors shall be developed using the insurer's most actuarially sound company-specific rolling calendar year data excluding catastrophes, for the most recent 8, 12, 16, 20, or 24 quarters. The insurer shall file its rate change application using the single data period that it determines to be the most actuarially sound. The Commissioner may require the use of an alternative data period if the Commissioner determines that use of the alternative is the most actuarially sound. Frequency trend shall be calculated as reported or closed claims divided by exposures. Severity trend shall be calculated on paid losses divided by closed claims or total paid losses, including partial payments in previous calendar years, on closed claims divided by closed claims. The insurer shall submit the frequency and severity calculations on all bases, and shall demonstrate that its selection is the most actuarially sound. Premium trend factors shall be developed using company-specific premium per exposure data.

⁷ Per CCR 2644.7 (d), for homeowners, multiple peril, and private passenger automobile liability and physical damage, the standard for full credibility for loss trend shall be 6000 total claims over the same number of quarters as used in subsection (b) for each form for homeowners and for each coverage for private passenger automobile. Partial credibility shall be the square root of the ratio of the actual number of claims divided by the full credibility standard. For private passenger automobile other than motorcycle, the complement of credibility for loss trend shall be calculated using the latest available California Fast Track paid loss, closed claim count and earned exposure data, the complement shall be based on the exponential curve of best fit to the most recent rolling calendar year data for the same number of quarters as used in subsection (b). For uninsured and underinsured motorist bodily injury and medical payments coverages, the complement shall use the California Fast Track bodily injury data. For uninsured and underinsured motorist property damage coverages, the complement shall use the California Fast Track property damage data. The Commissioner may modify the result of the calculation from California Fast Track data to take into account factors not reflected in the historical data, pursuant to section 2646.3.

⁸ http://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0200-prior-approval-factors/upload/PriorAppRateFilingInstr_Ed_01-19-2022.pdf

underwriting guidelines that have a rate impact, the following items must accompany the rate application:

- A clean copy of the current manual rate, rule and/or guideline pages.
- A marked-up copy of the current manual rate, rule and/or guideline pages. In the revised pages, underline any additions to, and use brackets ([]) to identify any deletions from, the current pages.
- A clean copy of the complete proposed manual.

24. Therefore, an insurer's underwriting rules, rates and class factors are part of an integrated system, all subject to prior approval by the CDI, that combine to result in actuarially sound premiums to eligible policyholders. If any one element were to materially change, an adjustment to the other elements of the system may be required to maintain actuarial soundness.

25. In addition to the regulatory requirements, actuaries setting rates must also adhere to the Actuarial Standards of Practice ("ASOPs") promulgated by the Actuarial Standards Board and Statements of Principles promulgated by the Casualty Actuarial Society. Some Principles relevant to rate setting include:

- ASOP 53: The actuary should consider which historical data are available and appropriate for estimating future costs.
- ASOP 23: The actuary should consider whether the data is suitable for the intended purpose of an analysis and relevant to the system or process being analyzed.
- ASOP 25: The actuary should apply credibility procedures that appropriately consider the characteristics of both the subject experience and the relevant experience, and relevant experience should have characteristics similar to the subject experience.
- CAS SOPs: A rate is reasonable and not excessive, inadequate, or unfairly discriminatory if it is an actuarially sound estimate of the expected value of all future costs associated with an individual risk transfer.

26. In support of the premiums charged to policyholders, the inputs to the overall PPA rate calculations (such as written premium and loss trend) are derived from United Services' and GIC's relevant historical data, as well as parameters provided by the CDI. The overall premiums must be within the permissible range of reasonable rates as defined by the CCR.

27. Exhibit 1 is an illustrative example using Collision coverage. This example is from United Services's 2017 filing that was approved by the CDI. Exhibit 1 lists all the critical inputs that go into an overall PPA rate calculation, as well as the resulting outputs, and compares the United Services amounts to the GIC amounts. Both companies in this example are using the same historical time period for loss and exposure data. During this historical period, there are material differences in loss per exposure as well as both historical and prospective trends. These differences result in distinctly different ranges for minimum and maximum indicated premium. The minimum and maximum Collision premiums calculated based on the GIC policyholder pool are approximately 55% higher than those calculated based on the United Services policyholder pool. In fact, the *lowest* allowable premium for GIC (\$435.39) is almost 30% more than the

highest allowable premium for United Services (\$336.37). This gap indicates that based on the data and parameters in these filings, there is *no overlap* in the range of base premiums between the two companies that would be considered approvable under California regulation.

PPA Class Plan Factor Analysis

28. California has specific requirements for PPA Class Plans, as follows:

- First, there are three “mandatory” rating factors: driving safety record, annual miles, and years driving experience (CIC 1861.02).
- Other “optional” factors that have been approved by the Commissioner include the type of vehicle and vehicle characteristics, vehicle use (pleasure, commute, etc.), multi-vehicle policy, academic standing, driver training courses, marital status of driver, persistency, multiple policies, and ZIP code bands (CCR 2632.5).
- The relativities associated with each rating factor are established by performing a rigorously specified sequential analysis, which analyzes each factor, one at a time, in a prescribed order (CCR 2632.7).⁹
- The “weights” of the rating factors must align in decreasing order of importance (CCR 2632.8), also known as “auto rating factor” compliance.
- To calculate the weights, companies can use their currently insured vehicles only or the same data used in the sequential analysis.¹⁰
- Factor weights for “optional” rating factors must be less than the third mandatory factor; if needed, relativities may be “pumped” or “tempered” to achieve factor weight compliance (CCR 2632.8).
- Insurers may not use a class plan, or charge or collect a premium which does not comply with the requirements of CCR 2632.

29. In addition to the regulatory requirements, relevant actuarial standards include:

⁹ Under CCR 2632.7:

(a) The determination of the initial relativities to associate with a rating factor shall be established by performing a sequential analysis. The sequential analysis shall remove the variation in loss costs already explained by prior factors.

(b) The sequential analysis shall analyze the rating factors one at a time, in the following order:

1. The first mandatory factor;
2. The second mandatory factor;
3. The third mandatory factor;
4. Any and all optional factors used by the insurer in accordance with subsection 2632.5(d). The order of analysis of the optional factors shall be determined by the insurer, with the exception that frequency band and severity band shall be analyzed last.

(c) The initial relativities, as developed, shall be balanced to a weighted average of 1.0 for multiplicative factors or balanced to a weighted average of 0.0 for additive factors. The weighting factor for the weighted average shall be the number of exposures from the data chosen for use in section 2632.8(b).

(d) The results of the sequential analysis shall be submitted to the Department in a computer file in a format specified by the Commissioner.

¹⁰ Under CCR 2632.8(b) (b) The data used to compute the weight shall be based on one of the following:

- (1) all of the subject company's currently insured vehicles;
- (2) the same data set used to perform the sequential analysis in Section 2632.7; or
- (3) the set of insured vehicles that may be published by the Department of Insurance.

- ASOP 12: Rates are considered equitable if differences in rates reflect material differences in expected cost. If business practices change, the actuary should consider testing the effects of such changes.
- CAS SOPs: Ratemaking should provide for the costs of an individual risk transfer so that equity among insureds is maintained.

30. Exhibit 2 compares the Collision factor weights from two GIC and United Services Class Plan filings, both submitted in 2016. The overall magnitude of the weights varies between the companies because the base rate is part of the calculation, and the base rates vary by company. To put the weights on a comparable basis, I also show the factor weights relative to the weight for Driving Record. This comparison shows how the relative importance of the rating variables differs between the two companies for several variables including Annual Mileage, Years Driving Experience, Marital Status, Good Student Discount, and Persistency. As described above, determining that a PPA class plan complies with California regulation depends heavily on the relative weight of rating variables for the individual insurer. As shown in Exhibit 2, many of the factor weights and relativities to Driving Record are materially different between United Services and GIC. For example, the Marital Status discount has a relativity of .288 for United Services versus .447 for GIC, indicating that the relative weights of Marital Status, and corresponding impacts on the base rates for Collision coverage, are very different between the two companies. These differences arise due to the different experience of the pool of policies insured by United Services vs. the pool of policies insured by GIC.

Summary of Schwartz Damage Methodologies

31. Schwartz proposes a “primary” (“RP1”) and an “alternative” (“RP2”) method for identifying injured GIC policyholders and calculating damages. Either method requires calculating both GIC’s and hypothetical United Services’ premiums for each GIC insured vehicle, which in turn requires applying the corresponding base rates and some relativities for each coverage as of ten dates from 2017 through 2021. This is the process described in Griglack’s declaration. For each company, the total premium for each policyholder is calculated by adding up Griglack’s estimated premiums across all the coverages and vehicles on the policy.

32. Schwartz’s “primary damages methodology” defines injury (and calculates damage) to each GIC policyholder as the GIC total premium minus the hypothetical United Services total premium, subject to a minimum of \$0 (paragraphs 17-20). However, as I explain below, it is not appropriate, from either an actuarial or regulatory perspective, to simply charge GIC the “United Services” premiums. And even if it were, this would mean the overall total premium collected by GIC in that scenario would have been lower, potentially causing GIC premiums to become inadequate (i.e. below the minimum premium allowed by CCR 2644.1).

33. Schwartz’s “alternative damages methodology” tries to account for this problem. He purports to increase the dollar amount of United Services premium by the dollar amount decrease in premium for GIC, to balance the total premiums (paragraphs 21-24). Since the hypothetical United Services premiums are increased, the estimated damages are lower using Schwartz’s alternative methodology. But this second methodology is also flawed, as I explain below.

Schwartz's injury calculations rest on a fundamentally unsound premise

34. In paragraph 16 of his Declaration, Schwartz states that “a reasonable damage calculation would reflect the differences between the premiums charged compared to what the appropriate premium would have been, consistent with actuarial and insurance practices and consistent with the applicable law.” However, Schwartz bases both his methods on premiums that are *inconsistent* with both actuarial standards of practice and applicable law.

35. Schwartz's primary damages methodology assumes that it would have been appropriate to calculate GIC customers' premiums using the United Services' rates and factors. But the United Services rates and factors were based on data from only United Services' policyholders; they do not reflect the combined experience of a risk pool comprising any GIC policyholders (including statutory “good drivers”). It is not actuarially sound, permissible under regulation, or legally allowed to charge rates to a fully credible risk portfolio that are calculated based on another company's risk pool without performing the requisite analysis on whether or not those rates are appropriate. Thus, calculating damages on hypothetical GIC premiums using the United Services' rates is an inherently flawed methodology.

36. To create premiums that are consistent with actuarial standards and regulatory requirements, USAA has two options: (1) move all GIC policyholders (or just the statutory “good drivers”) into United Services; or (2) fully combine GIC and United Services into one company. Both options would result in different rates and relativities from what United Services is using now.

37. If GIC policyholders (or just a subset of statutory “good drivers”) were placed into United Services, USAA would have to follow the process outlined below:

- Revise United Services's Placement Rules to make GIC Good Drivers eligible for United Services.
- Due to the change in Placement Rules, file revised **overall rate level indications** for United Services, which now would include GIC policyholders (or just a subset of GIC policyholders who qualify as statutory “good drivers”). Rates must be set consistently with applicable actuarial standards and California ratemaking regulations. To meet this standard, United Services (and GIC, to the extent there are any remaining policyholders) would be required to use historical loss and exposure data representative of each newly created risk pool. This restated historical data would inform the selection of new trend and loss development factors for each company, which may be different than the historical trend and loss development factors underlying the prior approved rates for United Services and GIC.
- Due to the change in Placement Rules, file revised **class plan analyses** using the historical loss and exposure experience restated to reflect the two new companies' risk pools and remain consistent with actuarial standards and California ratemaking regulations. Given the illustration in Exhibit 2, this would almost certainly result in different factor selections than current United Services factors to achieve auto rating factor weight compliance on a combined basis.

- Obtain regulatory approval, which, as previously stated, often requires multiple rounds of back-and-forth with the CDI because the CDI often requires revisions to proposed rates and class plan relativities.

38. In short, if USAA were to move GIC policyholders (or just a subset of statutory “good drivers”) into United Services, the resulting risk portfolio would necessitate a different set of rates and relativities from what United Services is currently using or has used in the past. I have not analyzed what those new rates and relativities would be; nor have I analyzed whether the resulting premiums for any particular GIC policyholder would be higher or lower than what they pay currently or paid in the past. But, given the complexity of the thousands of calculations and assumptions necessary to support those premiums, differences between current United Services and GIC rates, relativities, loss development factors and trends, and the effect of CDI involvement in the approval process, I am certain they would be different.

39. Alternatively, if GIC and United Services became one company, USAA would have to follow a very similar process. The only difference is the result would be one new combined company comprising United Services policyholders and all GIC policyholders, and this new company would have to go through a new ratemaking process. For the same reasons stated in the prior paragraph, I am certain that this would result in different rates and relativities from what either United Services or GIC have today.

40. But neither Griglack nor Schwartz attempt to contend with these realities. Both take a shortcut: just re-rate GIC policyholders under historical United Services rates. Again, that is not actuarially sound or permissible from a regulatory perspective.

41. To create his primary damages model, Schwartz appears to be making one of two assumptions. First, he would assume that USAA could somehow skip all the above steps, ignore whether it would be actuarially appropriate to apply the United Services rates and factors to GIC policyholders, and that there would be no need to demonstrate to CDI that using the United Services rates and factors would be appropriate. As described above, however, demonstrating rate compliance with California regulations is a rigorous process and must be supported by insurer data presented in a very specific way. Schwartz’s first assumption is therefore incorrect.

42. Second, Schwartz could assume that going through all the above steps would lead to the same result as calculating GIC policyholders’ (or just a subset of statutory “good drivers”) premiums under United Services’ rates. But as Exhibits 1 and 2 illustrate, the historical experience of the risk pools is so different for Collision coverage that there is no overlap in indicated rate (even between the lowest end of GIC and the highest end of United Services). Combining the risk pools would not have the same result as simply charging premiums to GIC policyholders based on current United Services rates, and Schwartz’s second assumption is therefore incorrect.

43. Neither Schwartz nor Griglack have provided any evidence or other basis to demonstrate that combining either GIC policyholders (or just a subset of statutory “good drivers”) with United Services would lead to their assumed result. Their methods have not been verified to be actuarially sound, do not comply with California regulatory requirements, and

would likely not be approved without adjustment by the CDI. Therefore, it is a fundamentally unsound premise to on which to base a damage model.

44. Schwartz’s alternative damages methodology implicitly recognizes these problems and makes a very limited attempt to correct them. It incorporates a simple on-top adjustment to “increase the dollar amount of USAA premium by the dollar amount decrease in premium for GIC, thereby balancing against each other” (paragraph 21). In “Comparison of Damage Calculations – Response to USAA.xlsx,” Schwartz shows example calculations, summarized in the table below.

Group	Actual Premium	Premium at USAA rates	“Revised” Premium
GIC Good Driver policies	\$18,400	\$16,750	\$17,367
USAA policies	\$30,000	\$30,000	\$30,000
Total	\$48,400	\$46,750	\$47,367

45. Schwartz’s alternative method is also inappropriate and based on an unsound premise for the following reasons:

- The new GIC premiums are still calculated using class plan rates and relativities based on United Services’ customer loss experience only. An insurance company cannot choose to ignore the historical experience for a segment of policyholders; the premiums must reflect the risk of the all the risks insured. Moving GIC insureds into United Services and leaving the rates the same—or otherwise recalculating GIC customers’ premiums using the United Services rates—is not actuarially sound or compliant with California regulations.
- The CDI requires PPA insurers to set overall rates within the reasonable range (between the minimum and maximum allowable premium). Schwartz’s method assumes that the sum of the total original GIC premiums and United Services premiums would be within the reasonable range of premium developed on a combined basis. However, given the differences in experience between the two groups, it is unlikely that the combined overall rates, developed on combined trend and loss development selections, would produce the same overall rate level as the sum of the separate premiums. Thus, Schwartz’s “revised” premiums are still likely to be out of compliance with regulatory requirements.
- The method does not actually “balance” the overall premium since there is no provision to go back and charge the adjusted United Services rates to anyone other than GIC members. This can be seen in the example calculation, where the overall “revised” premium is 2% lower than the overall actual premium. To actually balance the overall premium, Defendants would have to retroactively charge United Services policyholders the new combined rates.

46. In addition to departing from the ratemaking methods required by California law and regulation, Schwartz’s damage methodologies violate actuarial standards and principles, including:

- ASOP 53: Schwartz’s methods do not align with the standard of practice to consider appropriate historical data because he does not consider the impact of including GIC policyholders in the United Services risk pool.
- ASOP 25: The difference in rate levels and rating factors indicate that United Services and GIC policy bases had some differences in characteristics, but Schwartz performed no comparison of the differences in risk, thus deviating from the standard of practice to apply credibility procedures that appropriately consider the characteristics of both the subject experience and the relevant experience.
- ASOP 12: GIC customer expected costs were not considered in the United Services class plan relativities. Schwartz does not consider if/how changing the company placement would impact the risk classification relativities.
- CAS SOPs: A rate is reasonable and not excessive, inadequate, or unfairly discriminatory if it is an actuarially sound estimate of the expected value of all future costs associated with an individual risk transfer. Schwartz’s methods are based on premiums that are not actuarially sound estimates of the expected costs for GIC policyholders.

Summary of Griglack’s Premium Calculations

47. As described above, Schwartz’s damage calculation methods depend on the ability to calculate the differences between the premiums actually charged to putative class members as compared to what the appropriate premium would have been, consistent with applicable actuarial standards of practice and regulations. In his report, Griglack included calculations of the GIC and United Services premiums for GIC policyholders as of 10/1/2019 using the following methodology:

- Start with:
 - Characteristics of the policy, vehicle, and assigned driver for each GIC insured vehicle
 - Base rates by coverage for United Services vs. GIC
 - Class factors by coverage for United Services vs. GIC, for each of the nine factors that differ between companies
 - Expense fees for United Services vs. GIC
 - Good Driver Discount factors for United Services vs. GIC
- Calculate hypothetical premiums by coverage for United Services vs. GIC by multiplying base rates times nine class factors, plus expense fees, then multiplying by the Good Driver Discount factor, using base rates and rating factors that were effective 8/1/2019.
- Calculate the sums of the GIC and hypothetical United Services coverage premiums for each vehicle.
- Calculate the sums of the GIC and hypothetical United Services vehicle premiums for each policy.
- Compare the GIC and hypothetical United Services policy premiums.

48. Griglack proposes to use this approach to calculate the premium differences for ten “snapshots” of effective policies as of April 1st and October 1st for the years 2017 through 2021 (paragraph 25).

Griglack's proposed premium calculations are flawed and incomplete

49. As previously stated, both Griglack and Schwartz propose to take a shortcut to the damage calculation that relies on a fundamentally unsound premise; i.e. that it is actuarially sound and permissible under regulation just to re-rate GIC policyholders under historical United Services rates. The approach proposed by Griglack to perform this re-rate is actually a shortcut to the shortcut, in that it relies on an overly simplistic method that only performs a fraction of the calculation necessary to derive actual premiums charged, based on a fraction of the data necessary to know what coverage was actually purchased by the GIC policyholders. Neither Griglack nor Schwartz has proposed or considered any plan to address the missing portions of the data and calculations other than to assume that the rest is immaterial and/or consistent with the conclusions they presented based on shortcut methodologies applied to partial data.

Calculated premiums do not accurately measure total premium differences

50. Based on the premiums calculated using the method described above, Griglack concludes that “in total, GIC charged its policyholders more than [United Services] would charge those same policyholders” (paragraph 6). However, Griglack has not demonstrated that either the GIC premium or the United Services premium is sufficiently complete to draw that conclusion.

51. Griglack's “premiums” for both GIC and United Services are the result of multiplying the base rates and only nine rating factors. Griglack acknowledges that this is not a complete calculation of the premiums because it does not include all the rating factors (paragraph 27). It is my understanding that Griglack will eventually receive the information necessary to recalculate the complete GIC and United Services premiums (under his methodology) using all the necessary rating factors. In the meantime, however, I disagree with Griglack's assertion in paragraph 27 of his declaration that “our results and conclusions in Section IV [of his declaration] will not significantly change after receipt of a complete dataset.” The differences in the completely calculated premiums will look different from what Griglack is now reporting, therefore it is inappropriate to draw conclusions about how many policyholders were “injured” and by what amount based on Griglack's incomplete premium calculations.

52. The problem with Griglack's partial calculation is that it does not end up weighting the coverages correctly because missing rating factors do not produce the same premiums by coverage, even when the rating factors are the same between United Services and GIC. Griglack shows a trivial example of the issue (difference in factors of 1.05 for BI but 1.03 for PD), and claims “. . . the percent difference between GIC and USAA premium remains substantially the same; therefore we are confident that our results and conclusions in Section IV will not significantly change after receipt of a complete dataset” (paragraph 27).

53. While many relativities do not vary much by coverage, there are clear exceptions such as Model Year and Vehicle Symbol. Exhibit 3 shows an example of the impact of these differences on the calculation of the premium difference based on one vehicle (Hyundai) for one Plaintiff (Castro) at one point in time (9/5/2019). Even for this one simple example, which is supposed to represent an entire class, Griglack's calculations do not reconcile to reality. In my

opinion, Griglack has not sufficiently supported his assertion that the impacts of the other rating relativities do not significantly impact his conclusions.

Griglack does not use the correct rates and factors

54. Griglack's analysis is based on GIC policyholders as of 10/1/2019. Based on my examination of the input data, the effective dates of these policyholders' six-month policies ranged from 2/26/2019 to 9/30/2019.

55. Griglack stated that he used United Services base rates and rating factors from SERFF filing USAA-131769162, which implemented new base rates for United Services effective 8/1/2019. However, if Griglack was attempting to calculate the United Services premiums for these GIC policies using the United Services base rates and relativities in effect at the time of their renewals, Griglack would have needed to use the actual rates and relativities in effect on the renewal effective date. For policies with effective dates 8/1/2019 to 9/30/2019, that would be the base rates from USAA-131769162. However, for policies with effective dates prior to 8/1/2019, the correct base rates would be from a prior filing, from USAA-130660589, which was effective 12/28/2017.

56. If Griglack and Schwartz are proposing that the "appropriate" premiums that would have been charged are the United Services rates in effect at the time the GIC policy was written, the effective dates of the GIC policies need to be taken into account correctly. This means that policies from the same "snapshot" file may need to use different versions of rates, depending on the effective date of the policy. If this is not taken into account, Griglack and Schwartz cannot accurately say who was injured or by how much.

57. Mr. Griglack recognized this error during his deposition and has submitted an Amended Declaration to correct it. I have not reviewed the revised Excel spreadsheets underlying the analysis in his Amended Declaration.

Griglack and Schwartz's methodology does not consider mid-term changes

58. The Plaintiffs' depositions and insurance declarations pages indicate that they made multiple changes to their policies over time. For example, Plaintiffs added and dropped both vehicles and coverages, and changed coverage limits, several times. In my experience, this is not unusual; policyholders make various changes to their policies in the middle of a policy period, resulting in premium changes.

59. Here, in the Plaintiffs' examples, which are presumed to be representative of the class members, all these changes impacted their premium. As a result of such changes, the actual premiums charged, which are a key input to Schwartz's proposed damage calculation, can be very different from the premium calculated at a specific point in time.

60. As an example, I have summarized the premiums from various declaration pages for Plaintiff Castro's policy that incepted 3/5/2021 (Exhibit 4). At the time of the policy inception, Castro had one vehicle (another vehicle that had been involved in an accident had

been dropped from the policy), and the six-month policy premium was \$720.46. Over the course of the policy, Castro added a new vehicle and increased the policy limits. Based on the information on the declaration pages, I calculate that Castro was actually charged \$1,704.62 over the six-month period, more than twice the premium at a “snapshot” taken as of 3/5/2021. Griglack’s calculations have no provision to reflect this complexity.

61. Schwartz and Griglack’s proposal to use of “snapshots” does not take mid-term changes in premium into account. For accurate calculations of actual premiums charged, the algorithm would need to take in data at transaction level detail and incorporate complex calculations far beyond the simplistic methods proposed by Griglack and Schwartz. Griglack agreed with this in his deposition and proposed a “ratio approach” to account for mid-term changes and cancellations. The ratio approach is described as follows (pages 110 – 113):

- Start with:
 - Actual charged GIC premium
 - Recalculated 6-month GIC premium
 - Hypothetical 6-month United Services premium
- Calculate:
 - $\text{Ratio} = \text{Actual charged GIC premium} / \text{Recalculated 6-month GIC premium}$
 - $\text{Hypothetical United Services charged premium} = \text{Hypothetical 6-month United Services premium} * \text{Ratio}$
- Compare the Actual charged GIC premium and Revised United Services premiums

62. However, a fundamental flaw with this approach is that it assumes that the transactions impacting the GIC premium impact the United Services premium in the same way. While this is true of one possible scenario such as a mid-term policy cancellation, it is not necessarily true of many other possible scenarios under which the policy might be changed in a way that impacts the United Services premium differently than the GIC premium.

63. I show an example of this in Exhibit 3, Pages 6a and 6b. In the example shown on Page 6a, the liability limits are changed one month into the policy period. This increases the GIC charged premium by 8.8%, but because United Services has different increased limit factors, the United Services charged premium would increase 13.2%. Since the United Services premium increases by more than the GIC premium in this example, the “damages” are lower than what results from the “ratio approach.” Based on Griglack’s proposed “ratio approach” the estimated “damages” would be \$136.64, whereas the actual difference that would result from a more precise rerating would be \$108.82. Therefore Griglack’s “ratio approach” overstates the difference in premium by \$28.62, or 26.5% of the calculated “damages.”

64. The example on Page 6b shows the exact same change to liability limits, but this time occurring halfway through the policy period. In this case, the “damages” based on a precise rerating are \$17.13 lower than what results from the “ratio approach,” implying that Griglack’s “ratio approach” overstates the calculated “damages” by 14.9%. This simple example demonstrates that the timing of and nature of mid-term policy changes must be known and

accounted for in order to quantify their impact on premiums, and missing this information can materially impact the resulting calculation.

65. Furthermore, it is possible for a policy to have lower premiums in GIC than USAA for a portion of the 6-month term, and higher premium for another portion of the 6-month term. For example, policyholder ID “575304148” currently lives in zip code 92802 in Anaheim, CA. Under the current Griglack calculation, this policyholder is paying less under GIC than United Services. If this policyholder moved to a neighboring zip code 92801 in Anaheim, the policyholder would pay more under GIC than United Services.

66. In their declarations, both Plaintiffs listed numerous changes to their that impacted the actual premiums charged versus the initial “snapshot” premiums quoted based on the information considered at policy inception. However, neither Griglack nor Schwartz has offered any plan to explore or demonstrate the reasonableness of using a simplified “ratio approach” calculation that fails to account for such changes, or request data that would allow them to quantify the materiality of leaving out the essential information about what those changes are and when they occurred. In fact, Griglack specifically disclaimed his intent to do so in his deposition, stating that in order to accurately calculate what the United Services premiums would be, “we would essentially need all transactions for every policyholder, which doesn’t seem like a reasonable ask given the amount of transaction [sic] that there could be within any time frame” (page 132).

67. Given the potential materiality of the missing information, the distinction of being injured or uninjured, and the calculated “damages” resulting from such injury, become arbitrary and meaningless if based on Griglack’s short-cut hypothetical calculation using partial data.

Griglack does not update driver assignments

68. To calculate a premium for a vehicle within a household, driver characteristics such as marital status and years driving experience are associated with a vehicle for the purpose of calculating the vehicle premium. This process is known as “driver assignment.” As Griglack notes, the driver assignment algorithm is the same for GIC and United Services. I have summarized the algorithm below:

- i. Sort vehicles by Vehicle Base Premium, calculated as the product of the Bodily Injury coverage base rate, pure premium band relativity, increased limit factor, liability symbol relativity, model year relativity, vehicle age relativity, annual mileage factor, usage factor, and storage discount.
- ii. Sort drivers by Operator Base Premium, calculated as the product of the Bodily Injury factors for years driving experience, marital status, driving training discount, good student discount, mature driver improvement course discount, occasional operator discount, away at school discount, accident factor, conviction factor, premier operator discount, and good driver discount.
- iii. Assign operators to vehicles using Operator Status (principal or occasional), Vehicle Base Premium, and Operator Base Premium.

- iv. If number of vehicles exceeds the number of operators, rate the remaining vehicles without an assigned operator using “excess vehicle” factors shown in the rate tables.

69. While the driver assignment algorithm is the same for GIC and United Services, the outcomes may not necessarily be the same. The outcomes can differ because of differences in the factors used by GIC and United Services to calculate the Vehicle Base Premiums and Operator Base Premiums.

70. In Exhibit 5, I show two examples of how the same operator characteristics could result in a different sort order for the Operator Base Premium in United Services compared to GIC, potentially resulting in different driver assignments. Based on my review of Griglack’s work, it appears that he has failed to consider the impact of driver reassignments to calculate United Services premiums, nor has he disclosed any quantification of the impact of this assumption on the accuracy of his premium calculations. If Griglack had properly applied driver assignments, he likely would have ended up calculating different United Services premiums for some policyholders, in turn changing determination of injury and amount of damage calculated.

Griglack’s validation of his hypothetical premium calculation is insufficient

71. Griglack’s Declaration states “when we are provided with accurate data concerning each GIC policyholder, we will be able to calculate exactly what United Services would have charged that person” (paragraph 6). He also stated an intent to calculate exactly what GIC did charge that person in order to validate the methodology (paragraph 30). However, results presented in Griglack’s declaration fall far short of a complete premium calculation, which requires creation of a full rating engine that takes into account all 11 coverages, over 30 rating variables, and all the other considerations such as multiple sets of base rates and relativities over time, policy effective dates, transaction-level data, and driver assignment. While it is algorithmic, the programming is a very complex and difficult task. Calculations shown in his example spreadsheet do not consider the lion’s share of the rating variables and have not been shown to tie to the charged premium for any GIC policyholders, including the two Plaintiffs.

72. Griglack claims he was able to calculate premiums that match those provided in a USAA interrogatory response (paragraph 30); however Griglack provided no documentation of this work. Furthermore, if it is true, this is a validation sample of only two policies, which is insufficient to conclude anything about Griglack’s ability to perform the calculations accurately for hundreds of thousands of vehicles with different combinations of rating characteristics.

73. Although the damage calculations under both methods proposed by Schwartz rest entirely on the accuracy of the Griglack calculations, Schwartz stated in his deposition that he did not review the models and spreadsheets provided by Griglack (pages 46-47).

Summary

74. In his deposition, Schwartz stated that his damage calculations represent “what was actually charged less what was required to be charged taking into account the applicable statutory provisions” (pages 102-103) and that “the actual premium is a known fact” (page 110). However, for all the reasons cited above, Mr. Griglack’s premium calculations are flawed, incomplete, and should not be relied upon as a representation of the “actual premium,” much less “what was required to be charged.” Griglack has not sufficiently demonstrated that, even if given the additional data requested, he will be able to produce sufficiently accurate premium calculations for Schwartz’s damage models. Moreover, his hypothetical premium calculations fail to account for so much material information that they do not show conclusively whether a given policy would actually have had a lower premium under GIC’s rate structure than under the United Services rate structure, leading to an inability to identify which GIC members are injured or uninjured.

Griglack’s “probability” analysis is irrelevant

75. Griglack analyzes whether there is “an equal probability (50% chance) that the premium charged to a policyholder can be expected to be higher or lower in GIC than in USAA” (paragraph 37). He attempts to use this analysis to prove that his calculated premium differences between United Services and GIC are not a result of random chance.

76. Griglack’s use of probability analysis is inappropriate and irrelevant. There is nothing random about the company placement or premium calculations; the rules and algorithms for company placement and calculating a premium are deterministic, filed with the CDI, and must be consistently applied to each and every policy. The question of whether a policy rated at United Services rates is lower than the premium at GIC rates is one answered by applying California approved rates and rating algorithms to transaction-level data, not by probability.

Conclusion

77. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on June 1, 2022, at San Francisco, California.

By:



Nancy Watkins

EXHIBIT A1

**Milliman Actuarial Support
Comparison of GIC and United Services Overall Rate Level Calculation
Data as of 6/30/2016**

Collision

	(1)	(2)	(3)	(4)
<u>Line Description</u>	<u>GIC</u>	<u>United Services</u>	<u>Difference</u>	<u>Calculation</u>
	<u>(Note 1)</u>	<u>(Note 1)</u>	<u>(United Services vs GIC)</u>	
(1) California Direct Written Premium	63,375,311	134,354,581	112.0%	(2) / (1) - 1
(2) California Direct Earned Premium	60,633,004	132,770,993	119.0%	(2) / (1) - 1
(3) Miscellaneous Fees and Flat Charges not included in Line (2)	0	0	0	(2) - (1)
(4) Historic Losses (Note 2)	48,835,483	84,973,477	74.0%	(2) / (1) - 1
(5) Historic Defense and Cost Containment Expense (DCCE)	0	0	0	(2) - (1)
(6) Earned Exposure Units	134,508	383,386	185.0%	(2) / (1) - 1
(7) Loss Development Factor	0.960	0.936	-2.5%	(2) / (1) - 1
(8) DCCE Development Factor	0.960	0.936	-2.5%	(2) / (1) - 1
(9) Historical Loss Trend Factor	1.094	1.180	7.9%	(2) / (1) - 1
(10) Historical DCCE Trend Factor	1.094	1.180	7.9%	(2) / (1) - 1
(11) Historical Premium Trend Factor	1.044	1.112	6.5%	(2) / (1) - 1
(12) Premium Adjustment Factor	1.000	1.000	0.0%	(2) / (1) - 1
(13) Catastrophe Adjustment Factor	1.000	1.000	0.0%	(2) / (1) - 1
(14) Loss & DCC per Exposure	381.35	244.85	-35.8%	(2) / (1) - 1
(15) Ancillary Income per Exposure	1.94	0.44	-77.3%	(2) / (1) - 1
(16) Prospective Loss Trend	4.9%	9.2%	4.3%	(2) - (1)
(17) Prospective Premium Trend	2.3%	5.8%	3.5%	(2) - (1)
(18) Prospective Net Annual Trend = $[1+(16)] / [1 + (17)] - 1$	2.5%	3.2%	0.7%	(2) - (1)
(19) Projected Ult Loss & DCC Ratio	81.0%	63.6%	-17.4%	(2) - (1)
(20) Peril % of Overall Adjusted Earned Premium	36.6%	38.8%	2.2%	(2) - (1)
(21) Peril % of Overall Ultimate Loss & DCC	36.3%	32.5%	-3.8%	(2) - (1)
(22) Min CDI Allowed Profit	-6.6%	-6.6%	0.0%	(2) - (1)
(23) Max CDI Allowed Profit	7.9%	7.9%	0.0%	(2) - (1)
(24) Investment Income Fixed	0.3%	0.3%	0.0%	(2) - (1)
(25) Investment Income Variable	5.2%	5.2%	0.0%	(2) - (1)
(26) Efficiency Standard	24.9%	24.9%	0.0%	(2) - (1)
(27) Min CDI Allowed Indicated Change	-7.5%	-27.2%	-19.7%	(2) - (1)
(28) Max CDI Allowed Indicated Change	11.0%	-12.6%	-23.6%	(2) - (1)
(29) Min CDI Allowed Indicated Premium	435.39	280.47	-35.6%	(2) / (1) - 1
(30) Max CDI Allowed Indicated Premium	522.64	336.67	-35.6%	(2) / (1) - 1

Notes:

1. Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.
2. Losses from year ending Q2 2016.

EXHIBIT A2

Exhibit 2

**Milliman Actuarial Support
Comparison of GIC and United Services Factor Weights**

Collision

	(1)	(2)	(3)	(4)	(5)
	GIC (Note 1)	Factor Weight United Services (Note 2)	Relative to Driving Record GIC (Note 3)	United Services (Note 3)	Difference (Note 4)
Mandatory Rating Variables					
Driving Record	113.928	48.477	1.000	1.000	0.000
Annual Mileage	88.054	41.682	0.773	0.860	0.087
Years Driving Experience (YDE)	87.502	41.111	0.768	0.848	0.080
Optional Rating Variables					
Gender	6.757	3.507	0.059	0.072	0.013
Marital Status	50.956	13.967	0.447	0.288	-0.159
Operator Relationship	3.909	2.707	0.034	0.056	0.022
Driver Training Discount	6.322	1.563	0.055	0.032	-0.023
Good Student Discount	21.772	1.986	0.191	0.041	-0.150
Vehicle Usage	0.547	1.120	0.005	0.023	0.018
Multi-Car Discount	37.246	18.555	0.327	0.383	0.056
Combined Vehicle Characteristics	15.713	7.964	0.138	0.164	0.026
Multi-Policy Discount	24.104	14.183	0.212	0.293	0.081
Mature Driver Improvement Course	0.000	0.000	0.000	0.000	0.000
Persistence Discount	10.666	9.892	0.094	0.204	0.110
Frequency Bands	53.744	22.056	0.472	0.455	-0.017
Severity Bands	26.042	17.089	0.229	0.353	0.124

Notes:

1. GIC Collision factor weights are from SERFF filing # USAA-130660523, effective 12/28/2017.
2. United Services Collision factor weights are from SERFF filing # USAA-130660487, effective 12/28/2017.
3. (3) = (1) / (1) Driving Record. Column (4) calculated similarly.
4. (5) = (4) - (3).

EXHIBIT A3

Milliman Actuarial Support
Griglack Premium Differences

Comparison of Premium Calculations for Castro Hyundai

Row	Description	Source	Coverage							
			BI	PD	UMBI/UJMBI	CP	CL	RR	WOCD	TOTAL
(1)	Hypothetical United Services premium - Griglack method	Page 2	\$154.85	\$129.78	\$27.56	\$48.21	\$144.72	\$29.44	\$0.92	\$535.48
(2)	Hypothetical United Services premium - Complete rerating	Page 4	\$120.22	\$99.44	\$22.12	\$101.24	\$275.86	\$29.44	\$0.74	\$649.06
(3)	GIC rerated premium - Griglack method	Page 3	\$158.92	\$134.42	\$34.27	\$56.42	\$181.77	\$50.00	\$1.73	\$617.54
(4)	GIC rerated premium - Complete rerating	Page 5	\$123.33	\$102.93	\$27.50	\$119.12	\$350.37	\$50.00	\$1.39	\$774.64
(5)	Hypothetical United Services Complete / Griglack	= (2) / (1)	0.78	0.77	0.80	2.10	1.91	1.00	0.80	1.21
(6)	GIC rerated Complete / Griglack	= (4) / (3)	0.78	0.77	0.80	2.11	1.93	1.00	0.80	1.25
(7)	Griglack Hypothetical United Services - GIC	= (3) - (1)	\$4.07	\$4.64	\$6.71	\$8.22	\$37.05	\$20.56	\$0.82	\$82.07
(8)	Complete Hypothetical United Services - GIC	= (4) - (2)	\$3.11	\$3.48	\$5.38	\$17.88	\$74.50	\$20.56	\$0.66	\$125.58
(9)	Griglack % Difference GIC vs United Services	= [(3) - (1)] / (3)	2.6%	3.4%	19.6%	14.6%	20.4%	41.1%	47.1%	13.3%
(10)	Complete % Difference GIC vs United Services	= [(4) - (2)] / (4)	2.5%	3.4%	19.6%	15.0%	21.3%	41.1%	47.1%	16.2%

Notes:

1. CRA coverage is excluded in this exhibit to be consistent with Griglack's rating methodology.

Milliman Actuarial Support
Griglack Premium Differences

United Services - Griglack Semi-Annual Premium Calculation of Castro Hyundai

United Services	Total Premium	BI	PD	UMBI/UIMBI	CP	CL	RR	WOC
Base Rate	\$ 341.72	\$ 1.420	\$ 1.130	\$ 57.87	\$ 53.96	\$ 354.35	\$ 73.59	\$ 1.66
I/L or Deductible Factor		1.113	1.071	1.940	2.210	1.239	X	2.250
Pure Premium Band Factor		0.980	0.960	0.872	0.994	0.999	X	0.872
Years Driving Experience		1.050	1.060	1.200	1.290	1.040	X	0.920
Gender		0.820	0.820	0.840	0.950	1.070	X	1.200
Marital Status		1.000	1.000	1.000	0.860	0.780	X	0.840
Conviction Factor		1.250	1.250	1.100	1.050	1.200	X	1.100
Premier Operator Discount		1.000	1.000	1.000	1.000	1.000	X	1.000
Annual Mileage		0.640	0.620	0.690	0.860	0.710	X	0.690
Expense Fee	\$ 22.50	\$ 0.800	\$ 19.00	\$ -	\$ 7.75	\$ 37.50	\$ -	\$ -
Good Driver Discount	\$ 309.70	\$ 0.800	\$ 259.56	\$ 55.13	\$ 96.41	\$ 289.45	\$ 0.800	\$ 0.800
Annual Premium	\$ 535.48	\$ 154.85	\$ 129.78	\$ 27.56	\$ 48.21	\$ 144.72	\$ 29.44	\$ 0.92

Notes:

1. Base Rates and rating factors from Page 4.
Rating factors are not identical to the input file used by Griglack due to inconsistency with rates referenced on Page 4.
2. Calculations based on Griglack Excel file "SGRisk Limited 10-2019 Comparison (Rates from 19-14).xlsx".

Milliman Actuarial Support
Griglack Premium Differences

GIC - Griglack Semi-Annual Premium Calculation of Castro Hyundai

GIC	Total Premium	BI	PD	UMBI/UMBI	CP	CL	RR	WOC
Base Rate	\$ 428.94	\$ 432.51	\$ 76.08	\$ 88.96	\$ 584.69	\$ 125.00	\$ 3.32	
I/L or Deductible Factor	1.300	1.110	1.940	2.210	1.239	X	2.250	
Pure Premium Band Factor	0.994	1.030	0.884	0.963	0.959	X	0.884	
Years Driving Experience	0.990	1.000	0.940	1.080	1.090	X	0.940	
Gender	1.050	1.060	1.200	0.950	1.070	X	1.200	
Marital Status	0.820	0.820	0.840	0.860	0.780	X	0.840	
Conviction Factor	1.000	1.000	1.000	1.000	1.000	X	1.000	
Accident Factor	1.300	1.250	1.100	1.050	1.200	X	1.100	
Premier Operator Discount	1.000	1.000	1.000	1.000	1.000	X	1.000	
Annual Mileage	0.610	0.590	0.630	0.760	0.550	X	0.630	
Expense Fee	\$ 22.50	\$ 19.00	\$ -	\$ 7.75	\$ 37.50	\$ -	\$ -	
Good Driver Discount	0.800	0.800	0.800	0.800	0.800	0.800	0.800	
Annual Premium	\$ 317.85	\$ 268.84	\$ 68.54	\$ 112.85	\$ 363.55	\$ 100.00	\$ 3.47	
Semi-Annual Premium	\$ 617.54	\$ 158.92	\$ 134.42	\$ 34.27	\$ 56.42	\$ 181.77	\$ 50.00	\$ 1.73

Notes:

1. Base Rates and rating factors from Page 5.
Rating factors are not identical to the input file used by Griglack due to inconsistency with rates referenced on Page 5.
2. Calculations based on Griglack Excel file "SGRisk Limited 10-2019 Comparison (Rates from 19-14).xlsx".

**Milliman Actuarial Support
Griglack Premium Differences**

United Services - Complete Semi-Annual Premium Calculation of Castro Hyundai

	BI	PD	UMUIMBI	CP	CL	RR	WOCD	CRA
Base Rate	341.72	390.29	57.87	53.96	354.35	73.59	1.66	X
Insured Amount Rate	X	X	X	X	X	X	X	X
PIP Option Factor	X	X	X	X	X	X	X	X
APIOption Factor	X	X	X	X	X	X	X	X
Territory Liability Relativity	1.1132	1.071	0.872	0.9936	0.9991	X	0.872	X
Increased Limit Factor	1.42	1.13	1.94	X	X	X	X	X
Liab Symbol Factor	0.8873	0.8746	X	X	X	X	X	X
ModelYearRel	1.1155	1.1155	X	X	X	X	X	X
MakeModelRatingFactor	1	1	X	1	1	X	X	X
Deductible Relativity	X	X	X	2.21	1.2387	X	2.25	X
New Veh Disc Factor	0.96	0.96	X	0.96	0.96	X	X	X
PD Conversion Factor	X	X	X	X	X	X	X	X
Accident Surcharge Factor	1.25	1.25	1.1	1.05	1.2	X	1.1	X
Conviction Surcharge Factor	1	1	1	1	1	X	1	X
DTC Disc Factor	1	1	1	1	1	X	1	X
Good Stud Disc Factor	1	1	1	1	1	X	1	X
Occasional Operator Discount Factor	1	1	1	1	1	X	1	X
Away At School Disc Factor	1	1	1	1	1	X	1	X
Annual Mileage Factor	0.64	0.62	0.69	0.86	0.71	X	0.69	X
Usage Factor	1	1	1	1	1	X	1	X
Multicar Factor	0.88	0.88	0.88	0.88	0.88	X	0.88	X
Operator Youthful Relationship Factor	X	X	X	X	X	X	X	X
Operator Vehicle Youthful Relationship Factor	X	X	X	X	X	X	X	X
AntiTheft Discount	X	X	X	0.8	X	X	X	X
Storage Veh Disc Factor	1	1	1	1	1	1	1	X
DDC Coverage Factor	1	1	X	X	X	X	X	X
Symbol Model Year Rel	X	X	X	3.53	2.61	X	X	X
Gender Factor	1.05	1.06	1.2	0.95	1.07	X	1.2	X
Marital Status Factor	0.82	0.82	0.84	0.86	0.78	X	0.84	X
Driving Exp Factor	0.98	0.96	0.92	1.29	1.04	X	0.92	X
Premier Oper Cov Factor	1	1	1	1	1	X	1	X
Multi Policy Disc Cov Factor	0.96	0.96	0.96	0.96	0.96	X	0.96	X
Persistency Disc Cov Factor	0.95	0.95	0.95	0.95	0.95	X	0.95	X
Military Garaging Discount	X	X	X	1	1	X	X	X
Vehicle History Score Factor	X	X	X	X	X	X	X	X
VariablePrem	X	X	X	X	X	X	X	78.23
Car Replacement Assistance CP	X	X	X	X	X	X	X	0.061
Car Replacement Assistance CL	X	X	X	X	X	X	X	0.097
Expense Fee	22.5	19	X	7.75	37.5	X	X	X
GDD Factor	0.8	0.8	0.8	0.8	0.8	0.8	0.8	X
Policy Term Factor	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
Calculated Semi-Annual Premium	\$120.22	\$99.44	\$22.12	\$101.24	\$275.86	\$29.44	\$0.74	\$39.11

Notes:

1. From Excel file "CA Auto 025574112 09-05-2019 USAA.xlsx".

**Milliman Actuarial Support
Griglack Premium Differences**

GIC - Complete Semi-Annual Premium Calculation of Castro Hyundai

	BI	PD	UMUIMBI	CP	CL	RR	WOCD	CRA
Base Rate	428.94	432.51	76.08	88.96	584.69	125	3.32	X
Territory Liability Relativity	0.9944	1.0302	0.884	0.963	0.9588	X	0.884	X
Increased Limit Factor	1.3	1.11	1.94	X	X	X	X	X
Liab Symbol Factor	0.8873	0.8746	X	X	X	X	X	X
ModelYearRel	1.1155	1.1155	X	X	X	X	X	X
Deductible Relativity	X	X	X	2.21	1.2387	X	2.25	X
New Veh Disc Factor	0.96	0.96	X	0.96	0.96	X	X	X
Accident Surcharge Factor	1.3	1.25	1.1	1.05	1.2	X	1.1	X
Conviction Surcharge Factor	1	1	1	1	1	X	1	X
DTC Disc Factor	1	1	1	1	1	X	1	X
Good Stud Disc Factor	1	1	1	1	1	X	1	X
Occasional Operator Discount Factor	1	1	1	1	1	X	1	X
Away At School Disc Factor	1	1	1	1	1	X	1	X
Annual Mileage Factor	0.61	0.59	0.63	0.76	0.55	X	0.63	X
Usage Factor	1	1	1	1	1	X	1	X
Multicar Factor	0.88	0.88	0.88	0.88	0.88	X	0.88	X
AntiTheft Discount	X	X	X	0.8	X	X	X	X
Storage Veh Disc Factor	1	1	1	1	1	1	1	X
DDC Coverage Factor	1	1	X	X	X	X	X	X
Symbol Model Year Rel	X	X	X	3.53	2.61	X	X	X
Gender Factor	1.05	1.06	1.2	0.95	1.07	X	1.2	X
Marital Status Factor	0.82	0.82	0.84	0.86	0.78	X	0.84	X
Driving Exp Factor	0.99	1	0.94	1.08	1.09	X	0.94	X
Premier Oper Cov Factor	1	1	1	1	1	X	1	X
Multi Policy Disc Cov Factor	0.96	0.96	0.96	0.96	0.96	X	0.96	X
Persistency Disc Cov Factor	0.95	0.95	0.95	0.95	0.95	X	0.95	X
Military Garaging Discount	X	X	X	1	1	X	X	X
VariablePrem	X	X	X	X	X	X	X	99.02
Car Replacement Assistance CP	X	X	X	X	X	X	X	0.061
Car Replacement Assistance CL	X	X	X	X	X	X	X	0.097
Expense Fee	22.5	19	X	7.75	37.5	X	X	X
GDD Factor	0.8	0.8	0.8	0.8	0.8	0.8	0.8	X
Policy Term Factor	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
Calculated Semi-Annual Premium	\$123.33	\$102.93	\$27.50	\$119.12	\$350.37	\$50.00	\$1.39	\$49.51

Notes:

1. From Excel file "CA Auto 25574112 09-05-2019 GIC \$1202.89.xlsx"

Milliman Actuarial Support
Griglack Premium Differences

Griglack Ratio Method - Effect of Mid Term Changes - One Month In

Row	Description	Source	Coverage							TOTAL
			BI	PD	UMB/UIMBI	CP	CL	RR	WOCD	
(1)	GIC 6-month rerated premium - Full Rating	Page 5	\$123.33	\$102.93	\$27.50	\$119.12	\$350.37	\$50.00	\$1.39	\$774.64
(2)	Hypothetical United Services 6-month premium - Full Rating	Page 4	\$120.22	\$99.44	\$22.12	\$101.24	\$275.86	\$29.44	\$0.74	\$649.06
(3)	Castro Current Limits: 50,000/100,000 50,000 50,000/100,000	Castro Policy Documents for 2019: GIC	1,300	1,110	1,940	X	X	X	X	
(4)		Hypothetical United Services rates on Castro	1,420	1,130	1,940	X	X	X	X	
(5)	Hypothetical Increased Limits: 1,000,000/1,000,000 500,000 1,000,000/1,000,000	Hypothetical Increased Limits: GIC	1,850	1,290	3,200	X	X	X	X	
(6)		Hypothetical Increased Limits: United Services	2,330	1,340	3,200	X	X	X	X	
(7)	GIC 6-month rerated premium at new limits	(Note 2)	\$171.70	\$118.38	\$45.37	\$119.12	\$350.37	\$50.00	\$1.39	\$856.33
(8)	Hypothetical United Services premium at new limits		\$191.50	\$116.51	\$36.49	\$101.24	\$275.86	\$29.44	\$0.74	\$751.77
(9)	GIC actual charged premium	(1)*16.5% + (3)*(1-16.5%)	\$163.73	\$115.84	\$42.42	\$119.12	\$350.37	\$50.00	\$1.39	\$842.86
(10)	Hypothetical United Services charged premium	(2)*16.5% + (4)*(1-16.5%)	\$179.75	\$113.70	\$34.12	\$101.24	\$275.86	\$29.44	\$0.74	\$734.84
(11)	GIC charged / rerated	(9) / (1) - 1	32.8%	12.5%	54.2%	0.0%	0.0%	0.0%	0.0%	8.8%
(12)	United Services charged / rerated	(10) / (2) - 1	49.5%	14.3%	54.2%	0.0%	0.0%	0.0%	0.0%	13.2%
(13) Griglack Ratio = (9) Total / (1) Total:										1.088
(14) Griglack Ratio Adjusted United Services = (2 Total) * (13):										\$706.22
(15) Griglack Dollar Difference = (9) Total - (14):										\$136.64
(16) Actual Dollar Difference = (9) Total - (10) Total:										\$108.02

Notes:

- Charged premium calculation assumes the following:
 Start Date: 9/5/2019
 Change Date: 10/5/2019
 End Date: 3/5/2020
 Earned Percent: 16.5%

- Premiums calculated using the same methodology as rows (1) and (2) as shown on pages 4 and 5.
 Premium = [(Product of Multiplicative Factors) + Expense Fee] * GDD Factor * 0.5
 The only difference is replacing the Increased Limits factors in rows (3) and (4) with the factors in (5) and (6).

(17) Error = (15) - (16): \$ 28.62
 (18) Percent Error = (17) / (16): 26.5%

Milliman Actuarial Support
Griglack Premium Differences

Griglack Ratio Method - Effect of Mid Term Changes - Three Months In

Row	Description	Source	Coverage							TOTAL
			BI	PD	UMB/UIMBI	CP	CL	RR	WOCD	
(1)	GIC 6-month rerated premium - Full Rating	Page 5	\$123.33	\$102.93	\$27.50	\$119.12	\$350.37	\$50.00	\$1.39	\$774.64
(2)	Hypothetical United Services 6-month premium - Full Rating	Page 4	\$120.22	\$99.44	\$22.12	\$101.24	\$275.86	\$29.44	\$0.74	\$649.06
(3)	Castro Current Limits: 50,000/100,000 50,000 50,000/100,000	Castro Policy Documents for 2019: GIC	1,300	1,110	1,940	X	X	X	X	
(4)		Hypothetical United Services rates on Castro	1,420	1,130	1,940	X	X	X	X	
(5)	Hypothetical Increased Limits: 1,000,000/1,000,000 500,000 1,000,000/1,000,000	Hypothetical Increased Limits: GIC	1,850	1,290	3,200	X	X	X	X	
(6)		Hypothetical Increased Limits: United Services	2,330	1,340	3,200	X	X	X	X	
(7)	GIC 6-month rerated premium at new limits	(Note 2)	\$171.70	\$118.38	\$45.37	\$119.12	\$350.37	\$50.00	\$1.39	\$856.33
(8)	Hypothetical United Services premium at new limits		\$191.50	\$116.51	\$36.49	\$101.24	\$275.86	\$29.44	\$0.74	\$751.77
(9)	GIC actual charged premium	(1)*50.0% + (3)*(1-50.0%)	\$147.52	\$110.65	\$36.43	\$119.12	\$350.37	\$50.00	\$1.39	\$815.48
(10)	Hypothetical United Services charged premium	(2)*50.0% + (4)*(1-50.0%)	\$155.86	\$107.97	\$29.30	\$101.24	\$275.86	\$29.44	\$0.74	\$700.42
(11)	GIC charged / rerated	(9) / (1) - 1	19.6%	7.5%	32.5%	0.0%	0.0%	0.0%	0.0%	5.3%
(12)	United Services charged / rerated	(10) / (2) - 1	29.6%	8.6%	32.5%	0.0%	0.0%	0.0%	0.0%	7.9%
(13) Griglack Ratio = (9) Total / (1) Total: 1.053										
(14) Griglack Ratio Adjusted United Services = (2 Total) * (13): \$683.28										
(15) Griglack Dollar Difference = (9) Total - (14): \$132.20										
(16) Actual Dollar Difference = (9) Total - (10) Total: \$115.07										

Notes:

- Charged premium calculation assumes the following:
 Start Date: 9/5/2019
 Change Date: 12/5/2019
 End Date: 3/5/2020
 Earned Percent: 50.0%

- Premiums calculated using the same methodology as rows (1) and (2) as shown on pages 4 and 5.
 Premium = [(Product of Multiplicative Factors) + Expense Fee] * GDD Factor * 0.5
 The only difference is replacing the Increased Limits factors in rows (3) and (4) with the factors in (5) and (6).

(17) Error = (15) - (16): \$ 17.13
 (18) Percent Error = (17) / (16): 14.9%

EXHIBIT A4

Exhibit 4

**Milliman Actuarial Support
Impact of Mid-Term Changes**

Plaintiff Castro Example

(1)	(2)	(3)	(4)	(5)	(6)
Start Date	End Date	Description of Change	Six-month Policy Premium	% Policy Period	Actual Premium Charged
3/5/2021	3/11/2021	Policy renewal	\$720.46	3.3%	\$23.49
3/12/2021	4/28/2021	Add Tesla	\$1,608.34	25.5%	\$410.83
4/29/2021	8/27/2021	Correct Tesla info	\$1,822.99	65.2%	\$1,188.91
8/28/2021	9/5/2021	Increase limits	\$1,872.17	4.3%	\$81.40
Actual 6-month GIC premium charged:					\$1,704.62

Notes:

- Data in Columns (1) through (4) from the following documents (dec pages):
 - 17 USAA00000551-552.pdf
 - 16 USAA00000537-539.pdf
 - 15 USAA00000528-530.pdf
 - 13 USAA00000492-493.pdf
- (5) = [(2) - (1)] / 184.
- (6) = (4) x (5).

EXHIBIT A5

Exhibit 5

**Milliman Actuarial Support
Vehicle Assignment Investigation**

Examples Supporting the Need to Consider Vehicle Assignment Impact

Example 1 Rating Variable	Operator Inputs		GIC		United Services	
	Operator 1	Operator 2	Operator 1	Operator 2	Operator 1	Operator 2
Conviction Points	3 Points	1 Points	1.434	1.150	1.437	1.100
Number of Accidents	0 Accidents	1 Accident	1.000	1.300	1.000	1.250
Operator Base Premium			1.434	1.495	1.437	1.375
Operator Rank			2	1	1	2

Example 2 Rating Variable	Operator Inputs		GIC		United Services	
	Operator 1	Operator 2	Operator 1	Operator 2	Operator 1	Operator 2
Conviction Points	8 Points	1 Points	1.801	1.150	1.805	1.100
Number of Accidents	0 Accidents	2 Accident	1.000	1.600	1.000	1.600
Operator Base Premium			1.801	1.840	1.805	1.760
Operator Rank			2	1	1	2

Notes

1. Factors for Conviction Points and Number of Accidents match Excel workbook "SGRisk Limited 10-2019 Comparison (Rates from 19-14).xism". GIC factors from SERFF filing # USAA-130660523, effective 12/28/2017. United Services factors from SERFF filing #USAA-130660487, effective date 12/28/2017.
2. The examples shown above illustrate hypothetical scenarios of policies with two operators. All else equal, the policies with these operators and characteristics could see their vehicle assignments change if moved from GIC to United Services.

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

EILEEN-GAYLE COLEMAN and
ROBERT CASTRO, on behalf of
themselves and all others similarly
situated,

Case No. 3:21-cv-217-RSH-KSC

Plaintiffs,

v.

UNITED SERVICES AUTOMOBILE
ASSOCIATION and USAA GENERAL
INDEMNITY COMPANY

Defendants.

DECLARATION OF NANCY WATKINS

Qualifications

My name is Nancy Watkins, and my business address is 650 California Street, San Francisco, California. I am a Principal and Consulting Actuary with Milliman, Inc. (“Milliman”). I am a Fellow of the Casualty Actuarial Society (“CAS”) and a Member of the American Academy of Actuaries (“AAA”). Milliman is among the world’s largest providers of actuarial, risk management, and related technology and data solutions. I joined Milliman in 1997 as a Consulting Actuary and was made a Principal in 1999; currently I co-manage a practice of 38 actuaries and professionals in San Francisco. I have presented on technical ratemaking and other actuarial topics at many industry and regulatory conferences and have submitted and/or worked on hundreds of rate filings in the past 25 years, mostly for residential property and personal automobile insurance.

A complete statement of my education, employment, and academic credentials is included in the curriculum vitae filed as Attachment A with this testimony.

I meet the Qualification Standards of the American Academy of Actuaries to render the opinions contained herein.

My 2022 billable rate is \$825 per hour payable to Milliman, Inc. for my actuarial consulting services, including this expert witness support. My payment is not dependent on the outcome of this matter.

Background and Scope of Work

I¹ have been asked by counsel for United Services Automobile Association (“USAA” or “United Services”) and USAA General Indemnity Company (“GIC”) to provide an expert report in the matter of Eileen-Gayle Coleman, and Robert Castro, on behalf of themselves and all others similarly situated (“Plaintiffs”) v. USAA and GIC (collectively, “Defendants”), Case No. 3:21-cv-00217-RSH-KSC, pending in the United States District Court for the Southern District of California.

United Services and GIC write Private Passenger Auto (“PPA”) policies in California. Each of the companies insures a different segment of the military, as detailed in Defendants’ California Auto Company Placement Rules (“Placement Rules”) filed with the California Department of Insurance (“CDI”).² Generally speaking, United Services insures higher-paygrade officers and enlisted personnel (E-7 and above), and GIC insures lower-paygrade officers and enlisted personnel (E-1 through E-6). United Services’ and GIC’s current and historical rates have both been reviewed and approved by the CDI.

Plaintiffs allege that USAA’s practice of segmenting policyholders according to the Placement Rules -- and then charging higher base rates for GIC compared with United Services -- violates section 1861.16(b) of the California Insurance Code, which requires auto insurers to offer a statutory “good driver” a policy from the insurer with the lowest rates within a commonly controlled group of companies. Plaintiffs further allege that segmenting policyholders according to the Placement Rules -- and then charging higher base rates for GIC compared with United Services -- discriminates against enlisted personnel based on their military status in violation of California’s anti-discrimination laws.

I have been asked to provide background information and commentary from an actuarial perspective on PPA ratemaking in California, actuarial standards and principles, and publicly available data relevant to certain allegations by Plaintiffs.

Basis of Testimony

My testimony was based on a review of the following data and information:

- Plaintiffs’ Amended Complaint
- Plaintiffs’ Notice of Motion and Motion for Class Certification
- Plaintiffs’ Reply in Support of Motion for Class Certification dated 6/24/2022
- Plaintiffs’ Motion to Amend Proposed Class Definitions dated 10/12/22
- Publicly available California rate filings:
 - GIC SERFF filing #USAA-126501745, effective 8/1/2010
 - GIC SERFF filing #USAA-127200120, effective 2/13/2012

¹ Throughout this report, references to “I” or “my” are intended to include Milliman employees working under my direction to assist in this assignment, including internal peer reviewers. The opinions stated in this report are my opinions.

² For example, company placement rules were submitted as part of the rate filings USAA-130660589 and USAA-130660642 for United Services and GIC, respectively.

- GIC SERFF filing # USAA-130660642, effective 12/28/2017
- GIC SERFF filing # USAA-132398570, withdrawn 4/21/2022
- United Services SERFF filing # USAA-125258826, effective 3/4/2009
- United Services SERFF filing # USAA-130660589, effective 12/28/2017
- United Services SERFF filing # USAA-131769162, effective 8/1/2019
- United Services SERFF filing # USAA-132398216, withdrawn 4/21/2022
- Publicly available California class plan filings:
 - GIC SERFF filing # USAA-130660523, effective 12/28/2017
 - United Services SERFF filing #USAA-130660487, effective date 12/28/2017
- Statutory Annual Statements for United Services Automobile Association and USAA General Indemnity Company, downloaded from SNL.com
- California Code of Regulations (“CCR”)
- California Insurance Code (“CIC”)
- General Counsel Letter of Opinion, “Confidentiality of Underwriting Rules Filed with Rate Applications Pursuant to California Insurance Code section 1861.05(b)”, dated August 10, 2018: <http://www.insurance.ca.gov/0250-insurers/0300-insurers/0200-bulletins/bulletin-notices-commiss-opinion/upload/GCLetterOpinionUWGuidelines.pdf>
- California Department of Insurance Bulletin 2022-5, “Allegations of Racial Bias and Unfair Discrimination in Marketing, Rating, Underwriting, and Claims Practices by the Insurance Industry”, dated June 30, 2022: <https://www.insurance.ca.gov/0250-insurers/0300-insurers/0200-bulletins/bulletin-notices-commiss-opinion/upload/BULLETIN-2022-5-Allegations-of-Racial-Bias-and-Unfair-Discrimination-in-Marketing-Rating-Underwriting-and-Claims-Practices-by-the-Insurance-Industry.pdf>
- California Department of Insurance “Prior Approval Rate Filing Instructions” accessed 4/19/2022: http://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0200-prior-approval-factors/upload/PriorAppRateFilingInstr_Ed_01-19-2022.pdf
- California Department of Insurance “Information Sheet: Proposition 103 Intervenor Process”, accessed August 22, 2022: <http://www.insurance.ca.gov/01-consumers/150-other-prog/01-intervenor/info.cfm>
- California Department of Insurance Press Release, “Commissioner issues regulations prohibiting gender discrimination in automobile insurance rates”, dated January 3, 2019: <http://www.insurance.ca.gov/0400-news/0100-press-releases/2019/release003-19.cfm>
- CAS Statement of Principles Regarding Property and Casualty Insurance Ratemaking (“CAS SOPs”): <https://www.casact.org/sites/default/files/2021-05/Statement-Of-Principles-Ratemaking.pdf>
- Actuarial Standards of Practice (“ASOPs”): <http://www.actuarialstandardsboard.org/standards-of-practice/>
 - ASOP 1: *Introductory Actuarial Standard of Practice*
 - ASOP 12: *Risk Classification (for All Practice Areas)*
 - ASOP 23: *Data Quality*
 - ASOP 25: *Credibility Procedures*

- ASOP 53: *Estimating Future Costs for Prospective Property/Casualty Risk Transfer and Risk Retention*

Overview of California PPA Ratemaking Process

The process of setting insurance prices is referred to as “ratemaking” in the P&C insurance industry. The price the insurance consumer pays is referred to as “premium.” Insurance premiums can vary significantly for groups of insureds with different risk characteristics.

Ratemaking is composed of two separate types of analysis – an overall rate level analysis to determine the total premium for the insurer to collect from all policyholders in the aggregate within a given program or state during a prospective period, and a risk classification plan analysis to consider differences in expected risk between individual segments of policyholders, for purposes of calculating their individual premiums. Actuarially sound premiums are determined by (1) an overall amount of premium reasonable to charge for all business within a given program or state, and then (2) a class plan, comprising a rate calculation formula, base rates, and rating factors, that distributes the overall premium across all policyholders based on relative risk.

Proposition 103, passed by California voters in November 1988, requires the “prior approval” of the CDI before insurance companies can implement property and casualty insurance rates (or any changes to existing rates or class plans) for all P&C lines of business except life, ocean marine, health, disability, and mortgage insurance. For the non-exempted lines including PPA, insurers prepare rate applications, also known as “filings”, which are sent to the CDI via System for Electronic Rates & Forms Filing (“SERFF”). The CDI’s Rate Regulation Branch reviews these filings and ensures the proposed rates are not excessive, inadequate, or unfairly discriminatory. For PPA, the CDI requires a separate filing for each type of analysis, as follows:

- A “rate filing” contains support for proposed changes in the overall total premium. An insurer may also vary the rates by “group”, as described in CIC 1861.12.³ Typically, a separate rate level filing is submitted for each group.
- A “class plan” filing contains support for the rating factors used to vary premiums for policyholders with differences in expected risk.

Insurers have the burden of proving the requested rates are justified. If a CDI reviewer requires additional information and/or amendments regarding the proposed rates, they can send an “Objection Letter” to the insurer. The insurer then sends a “Response Letter” with the additional information and/or amendments. For example, the CDI issued numerous objections in the course of its review and approval of recent United Services and GIC filings, as follows:

- United Services rate filing # USAA-131769162: 3 objection letters
- United Services rate filing # USAA-130660589: 7 objection letters
- GIC rate filing # USAA-130660642: 7 objection letters

³ According to CIC 1861.12, “Any insurer may issue any insurance coverage on a group plan, without restriction as to the purpose of the group, occupation, or type of group. Group insurance rates shall not be considered to be unfairly discriminatory, if they are averaged broadly among persons insured under the group plan.”

- GIC class plan filing # USAA-130660523: 7 objection letters

Based on their review, the CDI may approve the rates or issue a notice of rate hearing. In practice, most issues are resolved by the described iterative process without a rate hearing.

Beyond the review of filings, the CDI has additional powers of enforcement and oversight to ensure that companies are complying with California regulations. For example, the Commissioner may also require an insurer to refile rates for auto lines every three years “as a means to determine whether a rate previously approved remains in compliance” (CCR 2644.50). Additionally, the CDI Field Rating and Underwriting Bureau also conducts periodic exams to determine whether companies are properly and consistently applying their approved rates, rating plans, and underwriting rules at the individual policy level.

Consumers who have objections to an insurer’s rates and/or underwriting rules also have options under California regulations. Any person can request a rate hearing based on the allegation that a rate is in effect which is excessive, inadequate, unfairly discriminatory (CCR 2646.4), and Proposition 103 authorized consumer “intervenor” to recover advocacy and witness fees and expenses under certain circumstances⁴. Consumers and consumer representatives have 45 days after the public notice of the rate change application to request a rate hearing (CIC 1861.05(c)). In addition, any person “aggrieved by any rate charged, rating plan, rating system, or underwriting rule” may file a written complaint with the CDI requesting that a review of the application of the rate, plan, system, or rule with respect to the insurance afforded to that person (CIC 1858). If the CDI has good cause to believe that the insurer is not in compliance with applicable requirements and standards, the Commissioner shall give notice to the insurer in writing and specifying a reasonable time in which the noncompliance may be corrected and the amount of any penalty that may be due. The insurer may either establish that the noncompliance does not exist, request a public hearing, or enter into an informal conciliation with the commissioner and complainant to resolve the matter (CIC 1858.1).

Setting the Overall PPA Premium

Title 10, Chapter 5, Subchapter 4.8, Article 4 of the California Code of Regulations is titled “Determination of Reasonable Rates.” It describes the process and parameters used to calculate the reasonable range of overall premium for a pool of insureds, as follows:

- Projected losses are calculated by adjusting the insurer’s historic losses for catastrophes, loss development, and trend (CCR 2644.4)⁵
- Support for loss development factors must be presented in the filing with the insurer’s historical experience shown in a proscribed fashion (CCR 2644.6)⁶

⁴ <http://www.insurance.ca.gov/01-consumers/150-other-prog/01-intervenor/info.cfm>

⁵ Per CCR 2644.4(a), “Projected losses” means the insurer’s historic losses per exposure, adjusted by catastrophe adjustment, as prescribed in section 2644.5, by loss development, as prescribed in section 2644.6, and by loss trend, as prescribed in section 2644.7.

⁶ Per CCR 2644.6, loss development shall be presented as a loss-development triangle, based on the dollar-weighted average of the ratios of losses for the three most recent accident-years, policy-years, or report-years available for a reporting interval. Filings shall contain both paid losses and case-specific reserves, stated separately. Loss development shall employ either paid losses or the sum of paid losses and case-specific reserves. The insurer shall submit both the factors and ultimate losses or claims for the paid and incurred loss and the reported and the paid

- Support for loss and premium trends must be presented in the filing with the insurer's historical experience shown in a proscribed fashion (CCR 2644.7)⁷
- Support for the credibility assigned to the insurer's historical trend must be presented in the filing with the insurer's historical experience shown in a proscribed fashion (CCR 2644.7)⁸
- Maximum allowable expenses and the minimum and maximum profit provisions are determined by parameters established by the Commissioner (CCR 2644.12, CCR 2644.16)
- The maximum overall premium is the company's projected losses and loss adjustment expenses, adjusted for estimated investment income on reserves and ancillary income, plus provisions for allowable expenses and maximum allowable profit (CCR 2644.2). The minimum permitted premium is calculated similarly (CCR 2644.3).
- According to CCR 2644.1 - Excessive or Inadequate Rates, "No rate shall be approved or remain in effect that is above the maximum permitted earned premium, as defined in section 2644.2, or is below the minimum permitted earned premium, as defined in section 2644.3. Where the Commissioner finds that a rate or proposed rate is excessive or inadequate, the rate or proposed rate shall not be used nor remain in effect."

claims development calculations and shall demonstrate that its selection is the most actuarially sound. Loss development data shall exclude catastrophes. Where the loss development factors within a given line significantly vary by subline, by size of loss, or by coverage, separate loss development factors shall be calculated in accordance with that evidence.

⁷ Per CCR 2644.7 (b), trend factors shall be based on the exponential curve of best fit. Companies shall file the most recent 8, 12, 16, 20, and 24 quarters of rolling calendar year data excluding catastrophes. The premium and loss trend factors shall be developed using the insurer's most actuarially sound company-specific rolling calendar year data excluding catastrophes, for the most recent 8, 12, 16, 20, or 24 quarters. The insurer shall file its rate change application using the single data period that it determines to be the most actuarially sound. The Commissioner may require the use of an alternative data period if the Commissioner determines that use of the alternative is the most actuarially sound. Frequency trend shall be calculated as reported or closed claims divided by exposures. Severity trend shall be calculated on paid losses divided by closed claims or total paid losses, including partial payments in previous calendar years, on closed claims divided by closed claims. The insurer shall submit the frequency and severity calculations on all bases and shall demonstrate that its selection is the most actuarially sound. Premium trend factors shall be developed using company-specific premium per exposure data.

⁸ Per CCR 2644.7 (d), for homeowners, multiple peril, and private passenger automobile liability and physical damage, the standard for full credibility for loss trend shall be 6000 total claims over the same number of quarters as used in subsection (b) for each form for homeowners and for each coverage for private passenger automobile. Partial credibility shall be the square root of the ratio of the actual number of claims divided by the full credibility standard. For private passenger automobile other than motorcycle, the complement of credibility for loss trend shall be calculated using the latest available California Fast Track paid loss, closed claim count and earned exposure data, the complement shall be based on the exponential curve of best fit to the most recent rolling calendar year data for the same number of quarters as used in subsection (b). For uninsured and underinsured motorist bodily injury and medical payments coverages, the complement shall use the California Fast Track bodily injury data. For uninsured and underinsured motorist property damage coverages, the complement shall use the California Fast Track property damage data. The Commissioner may modify the result of the calculation from California Fast Track data to take into account factors not reflected in the historical data, pursuant to section 2646.3.

The CDI Prior Approval Rate Filing Instructions⁹ require insurers to provide full rate support for any changes that affect the rate or cost of coverage to any insured. According to the CDI instructions, for all filings requesting changes in rates, rules, or underwriting guidelines that have a rate impact, the following items must accompany the rate application:

- A clean copy of the current manual rate, rule and/or guideline pages.
- A marked-up copy of the current manual rate, rule and/or guideline pages. In the revised pages, underline any additions to, and use brackets ([]) to identify any deletions from, the current pages.
- A clean copy of the complete proposed manual.

Therefore, an insurer's eligibility guidelines and underwriting rules, rates and class factors are part of an integrated system, all subject to prior approval by the CDI, that combine to result in actuarially sound premiums to eligible policyholders. If any one element were to materially change, an adjustment to the other elements of the system may be required to maintain actuarial soundness.

Further, as noted in the General Counsel Letter of Opinion, the filings containing these elements are subject to a 45-day statutorily-guaranteed public notice period so that consumers and consumer intervenors may analyze a company's rate application and determine whether to request a rate hearing.

In support of the premiums charged to policyholders, the inputs to the overall PPA rate calculations (such as written premium and loss trend) are derived from United Services' and GIC's relevant historical data, as well as parameters provided by the CDI. The overall premiums must be within the permissible range of reasonable rates as defined by the CCR.

Exhibit 1 is an illustrative example using Collision coverage. This example is from United Services' 2017 filing that was approved by the CDI. Exhibit 1 lists all the critical inputs that go into an overall PPA rate calculation, as well as the resulting outputs, and compares the United Services amounts to the GIC amounts. Both companies in this example are using the same historical time period for loss and exposure data. During this historical period, there are material differences in loss per exposure as well as both historical and prospective trends. These differences result in distinctly different ranges for minimum and maximum indicated premium. The minimum and maximum Collision premiums calculated based on the GIC policyholder pool are approximately 55% higher than those calculated based on the United Services policyholder pool. That is a reflection of the data showing that losses per exposure in GIC have been (and were projected to be, for the prospective policy period) higher compared to United Services. In fact, the *lowest* allowable premium for GIC (\$435.39) is almost 30% more than the *highest* allowable premium for United Services (\$336.37). This gap indicates that based on the data and parameters in these filings, there is *no overlap* in the range of base premiums between the two companies that would be considered approvable under California regulation.¹⁰

⁹ http://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0200-prior-approval-factors/upload/PriorAppRateFilingInstr_Ed_01-19-2022.pdf

¹⁰ The class plan analysis combines data from United Services, GIC, and the other two USAA companies, and the same indicated relativities before credibility weighting are used for each company. The current relativities, which are used as a complement of credibility, vary by company for selected factors resulting in differences in the

In addition to the regulatory requirements, actuaries setting rates must also adhere to the Actuarial Standards of Practice (“ASOPs”) promulgated by the Actuarial Standards Board and Statements of Principles promulgated by the Casualty Actuarial Society. Some actuarial standards and principles relevant to rate setting include:

- ASOP 1: Where the requirements of law conflict with the guidance of an ASOP, the requirements of law shall govern.
- ASOP 53: The actuary should consider which historical data are available and appropriate for estimating future costs.
- ASOP 23: The actuary should consider whether the data is suitable for the intended purpose of an analysis and relevant to the system or process being analyzed.
- ASOP 25: The actuary should apply credibility procedures that appropriately consider the characteristics of both the subject experience and the relevant experience, and relevant experience should have characteristics similar to the subject experience.
- CAS SOPs: A rate is reasonable and not excessive, inadequate, or unfairly discriminatory if it is an actuarially sound estimate of the expected value of all future costs associated with an individual risk transfer.

PPA Class Plan Factor Analysis

California has specific requirements for PPA Class Plans, as follows:

- First, there are three “mandatory” rating factors: driving safety record, annual miles, and years driving experience (CIC 1861.02).
- Other “optional” factors that have been approved by the Commissioner include the type of vehicle and vehicle characteristics, vehicle use (pleasure, commute, etc.), multi-vehicle policy, academic standing, driver training courses, marital status of driver, persistency, multiple policies, and ZIP code bands (CCR 2632.5).
- The relativities associated with each rating factor are established by performing a rigorously specified sequential analysis, which analyzes each factor, one at a time, in a prescribed order (CCR 2632.7).¹¹

credibility-weighted indicated relativities. The factor weights are calculated using company-specific data, and some selected factors vary by company.

¹¹ Under CCR 2632.7:

(a) The determination of the initial relativities to associate with a rating factor shall be established by performing a sequential analysis. The sequential analysis shall remove the variation in loss costs already explained by prior factors.

(b) The sequential analysis shall analyze the rating factors one at a time, in the following order:

1. The first mandatory factor;
2. The second mandatory factor;
3. The third mandatory factor;
4. Any and all optional factors used by the insurer in accordance with subsection 2632.5(d). The order of analysis of the optional factors shall be determined by the insurer, with the exception that frequency band and severity band shall be analyzed last.

- The “weights” of the rating factors must align in decreasing order of importance (CCR 2632.8), also known as “auto rating factor” compliance.
- To calculate the weights, companies can use their currently insured vehicles only or the same data used in the sequential analysis.¹²
- Factor weights for “optional” rating factors must be less than the third mandatory factor; if needed, relativities may be “pumped” or “tempered” to achieve factor weight compliance (CCR 2632.8).
- Insurers may not use a class plan, or charge or collect a premium which does not comply with the requirements of CCR 2632.

Even when changes in Class Plans are required by regulation or law, the new Class Plan must comply with these regulations. For example, when the Commissioner updated regulations to prohibit the use of gender in PPA insurance rating in 2019, companies were required to file revised Class Plans removing gender which maintained factor weight compliance and were “revenue neutral”, i.e., the filed changes did not change the overall amount of premium charged (CCR 2632.11)¹³. The CDI was required to review the new class plan filings, and the revised rating factors and base rates went into effect only after the CDI ensured the new rates were in compliance with the new regulations.

In addition to the regulatory requirements, relevant actuarial standards and principles include:

- ASOP 1: Where the requirements of law conflict with the guidance of an ASOP, the requirements of law shall govern.
- ASOP 12: Rates are considered equitable if differences in rates reflect material differences in expected cost. If business practices change, the actuary should consider testing the effects of such changes.
- CAS SOPs: Ratemaking should provide for the costs of an individual risk transfer so that equity among insureds is maintained.

Exhibit 2 compares the Collision factor weights from two GIC and United Services Class Plan filings, both submitted in 2016. The overall magnitude of the weights varies between the companies because the base rate is part of the calculation, and the base rates vary by company. To put the weights on a comparable basis, I also show the factor weights relative to the weight for Driving Record. This comparison shows how the relative importance of the rating variables differs between the two companies for several variables including Annual Mileage, Years Driving Experience, Marital Status, Good Student Discount, and Persistency. As described above, determining that a PPA class plan complies with California regulation depends heavily on the relative weight of rating variables for the individual insurer. As shown in Exhibit 2, many of

(c) The initial relativities, as developed, shall be balanced to a weighted average of 1.0 for multiplicative factors or balanced to a weighted average of 0.0 for additive factors. The weighting factor for the weighted average shall be the number of exposures from the data chosen for use in section 2632.8(b).

(d) The results of the sequential analysis shall be submitted to the Department in a computer file in a format specified by the Commissioner.

¹² Under CCR 2632.8(b) (b) The data used to compute the weight shall be based on one of the following:

- (1) all of the subject company's currently insured vehicles;
- (2) the same data set used to perform the sequential analysis in Section 2632.7; or
- (3) the set of insured vehicles that may be published by the Department of Insurance.

¹³ <http://www.insurance.ca.gov/0400-news/0100-press-releases/2019/release003-19.cfm>

the factor weights and relativities to Driving Record are materially different between United Services and GIC. For example, the Marital Status discount has a relativity of .288 for United Services versus .447 for GIC, indicating that the relative weights of Marital Status, and corresponding impacts on the base rates for Collision coverage, are very different between the two companies. These differences arise due to the different experience of the pool of policies insured by United Services vs. the pool of policies insured by GIC. Also, in some cases the differences in factor weight relativities result from differences in the rating relativities between GIC and United Services. These differences in rating factors means that that it not a foregone conclusion that a GIC policyholder will always pay more in premiums compared to the hypothetical scenario where that same policyholder was insured by United Services.

Fair vs. Unfair Discrimination

As previously described, ratemaking is a two-step process consisting of an overall rate level analysis to determine the total premium for the insurer to charge during a prospective period, and a risk classification plan analysis to determine how much to charge individual segments of policyholders, considering their differences in expected risk. A risk classification plan consists of a rating algorithm and rating factors that distribute the overall premium across all policyholders based on relative risk. Each policyholder is charged an actuarially fair rate relative to the risk of loss.

If risk classification were not used—that is, if there were no discrimination among policyholders—the options for setting rates would fall into two extremes. On one end, every policyholder would pay exactly the same premium for the same coverage, meaning that lower-risk segments of policies would subsidize higher-risk segments. On the other extreme end, every policyholder would essentially just pay their own claims, so that risks are not pooled and the coverage provided is not really insurance.

Principle 4 of the CAS SOP establishes that rates must not be excessive, inadequate, or unfairly discriminatory. This is the typical standard employed across the U.S. for purposes of insurance rate regulation, including California (CIC 1861.05). Under Principle 4, “A rate is reasonable and not excessive, inadequate, or unfairly discriminatory if it is an actuarially sound estimate of the expected value of all future costs associated with an individual risk transfer.” Under Principle 2, “Ratemaking should provide for the costs of an individual risk transfer so that equity among insureds is maintained.” In general, actuaries attempt to fulfill Principle 2 through risk classification, that is, establishing risk classes that assign risks to groups that are homogeneous with respect to the expected costs of risks within each group. ASOP 12 states “Rates within a risk classification system would be considered equitable if differences in rates reflect material differences in expected cost for risk characteristics. In the context of rates, the word *fair* is often used in place of the word *equitable*.”

According to CCR 2632.5, every auto insurer must establish a class plan for the calculation of rates that specifies rating factors which comply with the Good Driver discount requirements of CIC 1861.02 and other statutes and regulations. California has a rate standard (CIC 11732.5) that defines rates as unfairly discriminatory if, after allowing for practical limitations, price differentials fail to reflect equitably the difference in expected losses and expenses. The “unfairly discriminatory” standard is directed to an assessment of how an insurer’s total premium is distributed across policyholders. That distribution should occur such that higher risk groups of insureds pay more, and lower risk groups of insureds pay less.

Within this ratemaking context, the word *discrimination* on its own is synonymous with the word *differentiation* and does not necessarily represent a harmful or illegal practice. The distinction to be made is between fair discrimination, which is the goal of a well-designed risk classification system, and unfair discrimination, which does not result in actuarially sound classification factors, with persons of substantially the same risk and expense charged similar premiums.

Sometimes a characteristic that has in the past been considered usual, customary, and actuarially fair for risk classification purposes can be prohibited for such use in the future by law or regulation. For example, historically California regulations allowed insurers to recognize differences in expected losses by gender in their class plans. However, as previously mentioned the Commissioner issued new regulations effective in 2019 to prohibit “gender-based discrimination”, or the use of gender in PPA insurance rating. Insurers were required to file revised class plans no later than July 1, 2019 that eliminated all effects of gender as a rating factor, demonstrated compliance with factor weight ordering requirements, and demonstrated the revised class plan was revenue neutral, i.e. no projected change in the overall premium (CCR 2632.11(c)). In this and similar instances, the actuarially sound method of compliance for an insurance company is to re-analyze its historical data aggregated without such rating variables considered and file new rates and rating plans. In general, these filings would contain sufficient actuarial support to demonstrate that they comply with legal and actuarial standards, and, upon approval, would apply prospectively to future policies written or renewed after the filing effective date.

Actuarial Analysis of Plaintiffs’ Allegations

USAA’s placement rules decide which company a policyholder is grouped into. Rates within each company are determined based on historical experience of all policyholders within that company. Plaintiffs essentially object to the use of military paygrades in this fashion and allege that this constitutes unfair discrimination against personnel in lower paygrades, because the base rates for GIC are higher.¹⁴ Plaintiffs also claim that CIC 1861.16(b) requires USAA to offer the lowest rates to all Good Drivers, regardless of the Placement Rules. If either were found to be the case, then USAA would need to seek approval from the CDI to change its future approach to company placement and ratemaking to achieve what the CDI would be willing to accept as actuarially fair and adequate rates.

A straightforward but overly simplified solution would be to simply charge the GIC policyholders (or subset of GIC “Good Drivers”) premiums based on the current approved United Services rates. But the approved United Services rates and factors were based on data from only United Services’ policyholders; they do not reflect the combined experience of a risk pool comprising any GIC policyholders (including statutory “Good Drivers”). It is not actuarially sound, permissible under regulation, or legally allowed to charge rates to a fully credible risk portfolio that are calculated based on another company’s risk pool without performing the requisite analysis on whether those rates are appropriate. Rates are analyzed by the CDI in connection with the specific risks they are to be applied to, as defined by the underwriting rules and eligibility guidelines (General Counsel Letter of Opinion). The approach of charging GIC policyholders United Services rates is analogous to “preventing gender-based

¹⁴ It should be noted that differences in rating factors between the two companies can result in situations where the same risk has a higher final premium in USAA than GIC, even when base rates are higher in GIC.

discrimination” by saying that all males should be charged the rates based solely on historical experience for females, or vice versa. This approach would not reflect the overall combined risk of males and females, and it would not comply with actuarial standards of practice, the CAS SOPs, or California PPA regulation.

To create rates and premiums that are consistent with actuarial standards and regulatory requirements, and that address Plaintiffs’ allegations and claims, USAA likely would have three options: (1) move all GIC policyholders (or just the statutory “good drivers”) into United Services; (2) move all United Services policyholders into GIC; or (3) fully combine GIC and United Services into one company. All three options would result in different rates and relativities from what United Services is using now.

If GIC policyholders (or just a subset of statutory “good drivers”) were placed into United Services, USAA would have to follow the process outlined below:

- Revise United Services’ Placement Rules to make GIC policyholders (or just a subset of statutory “good drivers”) eligible for United Services.
- Due to the change in Placement Rules, file revised **overall rate level indications** for United Services, which now would include GIC policyholders (or just a subset of GIC policyholders who qualify as statutory “good drivers”). Rates must be set consistently with applicable actuarial standards and California ratemaking regulations. To meet this standard, United Services (and GIC, to the extent there are any remaining policyholders) would be required to use historical loss and exposure data representative of each newly created risk pool. This restated historical data would inform the selection of new trend and loss development factors for each company, which may be different than the historical trend and loss development factors underlying the prior approved rates for United Services and GIC.
- Due to the change in Placement Rules, file revised **class plan analyses** using the historical loss and exposure experience restated to reflect the two new companies’ risk pools and remain consistent with actuarial standards and California ratemaking regulations. Given the illustration in Exhibit 2, this would almost certainly result in different factor selections than current United Services factors to achieve auto rating factor weight compliance on a combined basis.
- Obtain regulatory approval, which, as previously stated, often requires multiple rounds of back-and-forth with the CDI because the CDI often requires revisions to proposed rates and class plan relativities.

In short, if USAA were to move GIC policyholders (or just a subset of statutory “good drivers”) into United Services, the resulting risk portfolio would necessitate a different set of rates and relativities from what United Services is currently using or has used in the past. I have not analyzed what those new rates and relativities would be; nor have I analyzed whether the resulting premiums for any particular GIC policyholder would be higher or lower than what they pay currently or paid in the past. But, given the complexity of the thousands of calculations and assumptions necessary to support those premiums, differences between current United Services

and GIC rates, relativities, loss development factors and trends, and the effect of CDI involvement in the approval process, I am certain they would be different.

The same holds true in reverse if USAA were to move all United Services policyholders into GIC.

Alternatively, if GIC and United Services became one company, USAA would have to follow a very similar process. The only difference is the result would be one new combined company comprising United Services policyholders and all GIC policyholders, and this new company would have to go through a new ratemaking process. For the same reasons stated in the prior paragraph, I am certain that this would result in different rates and relativities from what either United Services or GIC have today.

Comparison of USAA and GIC Profits

In the Plaintiffs' Reply in Support of Motion for Class Certification, the Plaintiffs included Exhibit D, which appears to be an excerpt from an internal USAA presentation dated September 15, 2017 and contains a table showing California "Current UW Profit", "Projected UW Profit", and "Annualized Net Trend" by company, as well as indicated rate level by coverage using data through March 31, 2016. The Plaintiffs state that "Defendants charge GIC insureds more than identically situated USAA insureds largely because they make greater profits off the GIC insureds. See, e.g., Ex. D (projecting 9.3% underwriting profit margin from GIC compared to 1.6% profit margin from USAA)" (Page 4, Footnote 2). This statement is misleading and refuted by publicly available data in several respects, demonstrating that both targeted and actual profits have historically tended to be lower for GIC than for United Services.

Actual Profits versus Target Profits

First, while Plaintiffs' Exhibit D does not provide any details on how the "Projected UW Profit" is calculated, or what assumptions are made, in general actual and projected underwriting profits are not the same as target underwriting profit provisions that are built into the rates. The CAS Ratemaking SOP identifies and describes principles which apply to the determination and CDI-approved review of P&C insurance rates. Principle 1 states that "Ratemaking is prospective because the property and casualty insurance rate must be developed prior to the transfer of risk." Actual experience will not conform exactly to the assumptions used in ratemaking analyses, and thus actual amounts will differ from projected amounts to the extent that actual experience is better or worse than expected. Such variation is inherent in any set of actuarial projections, and actual experience which is better than expected does not necessarily constitute unfairness, especially when considered over a brief period of time. Further, ASOP 30 notes that "While the estimated costs are intended to equal the average actual costs over time, differences between the estimate and actual costs of the risk transfer are to be expected in any given year." In summary, differences in actual and/or projected underwriting profits for United Services and GIC could

happen, and in fact are likely to happen, even if USAA is targeting similar underwriting profits in the rates for both companies.

Target Profits Not Higher for GIC

The suggestion that USAA has targeted higher profits from GIC policyholders vs. United Services policyholders is contradicted by publicly available data. Exhibit 3 summarizes ratemaking data, assumptions, indications, and proposed rate changes from USAA and GIC rate filings from 2017 (USAA-130660642 and USAA-130660589). The figures shown are taken from the CDI rate indication template, which produces a “minimum” and “maximum” allowed rate change; USAA selected the “proposed” rate changes within the allowable ranges.

For both United Services and GIC, the Implied Permissible Loss Ratio (Row 12) is shown for each coverage. A “loss ratio” is the ratio of losses to premiums. A higher loss ratio means that a greater share of the premium goes to pay claims, and a lower share of the premium goes to pay company expenses and profit. Within a rate indication analysis, a Permissible Loss Ratio is a target loss ratio used to estimate what prospective rates need to be to cover expected losses, expenses, and target profit. Assuming similar levels of expenses, a higher Permissible Loss Ratio corresponds to a lower target underwriting profit.

For every coverage except Collision and Miscellaneous Physical Damage, the permissible loss ratios were higher for GIC. The United Services permissible loss ratios were slightly higher than GIC for Collision (73.2% versus 72.8%). The difference was greater for Miscellaneous Physical Damage (79.5% versus 72.9%) but it is important to note that these coverages have relatively low premiums¹⁵. All coverages combined, the Permissible Loss Ratio for GIC was 4.7 percentage points higher than United Services (76.9% versus 72.2%), corresponding to a target profit provision 4.7 percentage points lower than United Services (5.4% versus 10.1%).

Therefore, the target profit provisions implied by USAA’s selected rates for both companies indicate that USAA was targeting lower profits, not higher profits, for GIC.

Actual Profits Not Higher for GIC

Assuming similar expenses, if United Services and GIC have similar actual loss ratios, this implies that the two companies had similar actual percentage profits. A lower loss ratio suggests higher profits, while a higher loss ratio implies lower profits.

A comparison of actual historical loss ratios for United Services and GIC shows that typically GIC has had higher loss ratios (and thus lower profits) than United Services. Exhibit 4 shows the historical loss ratios both countrywide (Page 1) and California only (Page 2). While there has been variation in the differential from year to year, on a countrywide basis, the GIC loss ratios

¹⁵ Miscellaneous Physical Damage includes Towing and Labor, Rental Reimbursement, and Waiver of Collision Deductible.

have been higher than the United Services loss ratios every year for the past ten years (2012-2021).

In California, the GIC loss ratio was higher than United Services for 2013 through 2017 (Exhibit 4, Page 2). Projecting from the loss experience as of March 31, 2016, USAA implemented a 1.5% rate increase for United Services and a 6.9% increase for GIC at the end of 2017. As discussed above, the target profit provisions in these 2017 rate filings were significantly higher for United Services compared to GIC. However, in 2018 and 2019, the actual United Services loss ratio was greater than the GIC loss ratio, not because the target profits were different but because the actual experience varied from the projected experience. Based on data through September 30, 2018, USAA prospectively increased the rates for United Services by 1.5% overall (Exhibit 4, Page 3). After this adjustment, the GIC loss ratios were once again higher than United Services loss ratios in 2020 and 2021 (Exhibit 4, Page 2).

To summarize, the actual GIC loss ratios in California have been higher than those of United Services in 7 out of the past 10 years – despite the relatively higher base rates charged to GIC policyholders. On a countrywide basis the GIC loss ratios have been higher than those of United Services in all 10 out of the past 10 years. Although there may be differences in expense as well that are not reflected in this data, the loss ratio results indicate consistently lower actual percentage profits for GIC compared with United Services, all else equal.

Conclusion

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on October 17, 2022, at Orinda, California.

By:



Nancy Watkins

Attachment A

NANCY P. WATKINS

Milliman, Inc.
650 California Street, Suite 2100
San Francisco, California 94108
(415) 394-3733

PROFESSIONAL EXPERIENCE

- 1997 to present MILLIMAN, INC.: Atlanta, GA and San Francisco, CA
Principal and Consulting Actuary — Manages San Francisco property & casualty consulting practice.
- 1991 to 1997 WATKINS CONSULTING CO.: Atlanta, GA
President — Owned and managed independent actuarial consulting firm.
- 1989 to 1991 PRICE WATERHOUSE, LLP: Atlanta, GA
Senior Manager and Consulting Actuary
- 1986 to 1989 JOHN HANCOCK REINSURANCE: Boston, MA
Actuarial Analyst
- 1983 to 1986 AETNA LIFE & CASUALTY: Hartford, CT
Actuarial Student

EDUCATION AND CREDENTIALS

B.S. in Mathematical Sciences, University of North Carolina at Chapel Hill
Fellow, Casualty Actuarial Society
Member, American Academy of Actuaries

AWARDS

American Academy of Actuaries Outstanding Volunteerism Award, November 2018
Casualty Actuarial Society Above and Beyond Achievement Award, October 2006

PROFESSIONAL SERVICE

Leader, Milliman Climate Resilience Initiative
Member, California Office of the State Fire Marshal Risk Modeling Advisory Workgroup and Wildfire Mitigation Advisory Committee
Co-Leader, Wildfire Knowledge Alignment Expert Working Group
Member, Climate Insurance Linked Resilient Infrastructure Finance Working Group of United Nations Capital Development Fund
Advisory Board Member, The Wharton Risk Center Policy Incubator initiative “Improving the financial recovery from coastal disasters: innovative risk transfer instruments”
Chair, American Academy of Actuaries Committee on Property and Liability Financial Reporting
Member, American Academy of Actuaries Casualty Practice Council
Member, American Academy of Actuaries Financial Reporting Council
Co-Chair, American Academy of Actuaries Best Estimates Working Group
Member, Casualty Actuarial Society Committee on Special Interest Seminars
Member, Casualty Actuarial Society Committee on Reinsurance Research

INVITED PRESENTATIONS

“Milliman Bungalow: Development of Proprietary Flood Program”
Casualty Actuaries in Reinsurance, August 2022

“Diversity and Inclusion in Practice”
CAS Seminar on Reinsurance, June 2022

“State of the Private Flood Market - Industry Perspective”
National Flood Conference, June 2022

” Understanding California Sea Level Rise Studies and Guidance”
Smart Coast California, May 2022

“Economic Consequences of Sea Level Rise”
Smart Coast California, May 2022

“Intersecting Issues of Climate Change, Insurance, Modeling and Risk Measurement”
Sandia BASES, April 2022

“U.S. Private Flood Market”
NAIC Catastrophe Risk (E) Subgroup, February 2022

“State of the Homeowners Fire and Flood Insurance Market”
California Association of REALTORS Public Policy Forum, January 2022

“Calling all actuaries: The Need for Risk Experts to Shape Climate Action”
CAS Annual Meeting, November 2021

“Dialogue with Spencer Glendon on Our Climate Future”
Milliman Climate Resilience Forum, September 2021

“Private Flood Market Development”
NAIC Insurance Summit, September 2021

“A Climate Crisis in Insurance Markets?”
Wharton Risk Center, August 2021

“Current State of the U.S. Private Flood Market”
National Flood Conference, June 2021

“Role of RR 2.0 in Future Loss Reduction”
National Flood Conference, June 2021

“Insurance Implications of Climate Change”
CREFC Sustainability Initiative, June 2021

“The Risk of Rapid Sea-Level Rise and the Financial Risks to U.S. Coastal Communities”
The House Select Committee on the Climate Crisis, May 2021

“A New Strategy for Addressing the Wildfire Epidemic in California”
Stanford Woods Institute for the Environment Webinar, April 2021

“Climate Risk and Market Value: Data Innovations for Real Estate”
ULI Climate Data Webinar, March 2021

“Climate Change: From Emerging Risk to Real Life Danger”
Milliman Climate Resilience Forum, March 2021

“U.S. Insurance Regulatory Climate Leadership”
Milliman Climate Resilience Forum, March 2021

“Unprecedented, Predictable, and Uninsurable: The Risks Posed by Climate Change”
Milliman Climate Resilience Forum, March 2021

“The Case for Change: Regulatory Approval of Catastrophe Models”
California Department of Insurance Virtual Meeting, December 2020

“Climate Data, Disclosure, and Industry Impacts”
ULI Resilience Summit, December 2020

“Private Flood Insurance: Then, Now, What's to Come?”
FAIR Conference, October 2020

“Regulatory Workshop on Private Flood Insurance”
Southeastern Zone Regulators Association, September 2020

“B2C Insurtech Strategy”
NYCA Insurance Symposium, September 2020

“Insurance Innovations: It's Not Your Grandmother's Flood Insurance”
Floodplain Management Association Annual Meeting, September 2020

“Clearing the Way for Regulatory Approval of Catastrophe Models”
NAIC Catastrophe Insurance Working Group Meeting, July 2020

“The Climate-Savvy Investor: Assessing Resilience in U.S. Markets”
ULI Spring Meeting, June 2020

“The State of the Private Flood Market”
National Flood Conference, June 2020

“The Role of Insurance in Climate Resilience”
Council on Foreign Relations, May 2020

“Regulatory Risk: Finding Safe Passage Through Flood's Choppy Waters”
RMS Exceedance, May 2020

“Making Communities Flood Resilient”
UNC Clean Tech Summit, February 2020

“The Economic and National Security Dimensions of Climate Change”
UNC Clean Tech Summit, February 2020

Climate Change and Real Estate Panel
ULI SF Climate Change in Real Estate, February 2020

“National Flood Insurance Program – The Need for Change”
NAIC Winter National Meeting, December 2019

“Clearing the Way for Regulatory Approval of Catastrophe Models”
Property Insurance Report National Conference, November 2019

“Staging Your State for Private Flood”
NAIC SE Regional Insurance Commissioners Meeting, October 2019

“Staging Your State for Private Flood”
NAIC Summer National Meeting, August 2019

“Is California Catastrophe Regulation Leading to a Homeowners Rate Crisis?”

APCIA Western Region General Counsel Conference, July 2019

“NFIP Reauthorization - How to Bridge the Flood Insurance Gap”

PCI National Flood Conference, June 2019

“Underwriting Private Flood Insurance”

RAA Board Meeting, April 2019

“Insurance: Transferring and Assessing Risk”

Hinshaw Sea Level Rise/Climate Change, April 2019

“Global Corporate Responsibility”

Climate Resilience Summit, November 2018

“The Future of Flood Insurance”

Risk Mitigation Leadership Forum, October 2018

“The Rising Private Flood Insurance Market”

Torrent Flood Seminar, July 2018

“Overview of the Private Flood Market”

CAS Underwriting Collaboration Seminar, June 2018

“NFIP Risk Rating and Policy Forms Redesign”

PCI National Flood Conference, June 2018

“What Federal Flood Insurance Reform Means to You”

RMS Exceedance, May 2018

“The Rising Flood Insurance Market”

Florida Insurance Market Summit, March 2018

“Competitive Analysis: Know the Data, Know the Market”

CAS Ratemaking, Product and Modeling Seminar, March 2017

“Private Flood Insurance”

CAS Severe Weather Workshop, March 2017

“Insuring Flood in the United States”

RAA Cat Risk Management Conference, February 2017

“Flood Insurance Pricing”

CAS Severe Weather Workshop, March 2016

“Flood Insurance - Private Market Alternatives”

Florida Insurance Market Summit, March 2016

“Strategies for Homeowners Profitability and Growth”

Casualty Actuaries of the Northwest, September 2015

“Assessing and Integrating Risk into Actuarial Practices”

California Insurance Commissioner / Risky Business / Stanford University Steyer-Taylor Center for Energy Policy and Finance / Sandia National Laboratories / American Academy of Actuaries Climate Risk Forum: Bridging Climate Science and Actuarial Practice, September 2014

“Property Analytics Using Third Party Data”

Guy Carpenter ERM and Capital Modeling Conference, September 2014

“Homeowners Profitability and Growth”

CSC Executive Innovation Series for Florida Residential Property, April 2014

“Best Practices Rating Model”

Property Casualty Insurers Association of America “Caught in the Middle” Roundtable, November 2013

“Caught in the Middle Panel”

Property Casualty Insurers Association of America Annual Meeting, October 2013

“Best Practices in Catastrophe Ratemaking”

Wharton Risk Management and Decision Processes Center National Cat Solutions Meeting, June 2013

“Homeowners Profitability”

CAS Spring Meeting, May 2013

“Beach Plan Deficit: Cost to N. C. Policyholders and Taxpayers”

North Carolina Legislative Research Subcommittee on Property Insurance Ratemaking, March 2012

“Using Predictive Analytics to Profitably Grow your Business”

Duck Creek Insurance Forum, May 2010

“Practical Applications of Predictive Modeling in Homeowners Insurance”

Casualty Actuarial Society Ratemaking and Product Management Seminar, March 2010

“California Private Passenger Auto Ratemaking — A Case Study”

Casualty Actuarial Society Ratemaking and Product Management Seminar, March 2009

North Carolina General Assembly Joint Select Study Committee on the Potential Impact of Major Hurricanes on the North Carolina Insurance Industry, October 2008

“Issues and Opportunities”

Fiserv Insurance Executive Summit, September 2008

“Auto Class Plan Filings”

Association of California Insurance Companies General Counsel Seminar, July 2008

“Reinsurance — Risk Transfer Overview”

Crittenden Medical Insurance Conference, April 2008

“Reinsurance: Accounting, Actuarial and Real World Perspectives”

International Association of Insurance Receivers Insolvency Workshop, January 2008

“Hot Topics in P&C Accounting and Reinsurance”

Fiserv Client Conference, September 2007

“Impact of Auto Rating Factor Regulations”

Association of California Insurance Companies General Counsel Seminar, August 2007

“Reinsurance Risk Transfer Practices”

Crittenden Reinsurance Conference, August 2007

“Finite Risk”

Casualty Actuarial Society Risk Transfer Limited Attendance Seminar, November 2006

“Hot Topics in P&C Accounting, Reporting and Reinsurance”

Fiserv Client Conference, September 2006

“Reinsurance Client Panel: Finite Reinsurance”

Fiserv Client Conference, September 2006

“Finite Reinsurance and Risk Transfer: Activities of the American Academy of Actuaries”

Reinsurance Association of American Current Issues Forum, May 2006

“Accounting Issues Update: Reinsurance Risk Transfer”

National Risk Retention Association Annual Conference, October 2005

“Insurance Risk Transfer — An Issues Update”

Casualty Loss Reserve Seminar, September 2005

“Issues Regarding Statutory Statements of Actuarial Opinion”

Southern California Casualty Actuarial Club Fall Meeting, September 2004

“NAIC/AAA Loss Reserve Symposium for Readers and Writers of Loss Reserve Opinions”,

Casualty Loss Reserve Seminar, September 2003

“Why Establish a Virtual Company?”

Virtual Insurance Operations Conference, June 2001

“Actuaries and the Internet”

Casualty Actuarial Society Annual Meeting, November 2000

“Virtual Insurance Companies”

Virtual Insurance Operations Forum, November 2000

PUBLICATIONS

“Conversations about Risk Rating 2.0.”

Wharton Risk Center, May 2022

“Climate risk and real estate: Emerging practices for market assessment.”

ULI Knowledge Finder, October 2020

“At a crossroads.”

Milliman Insight, September 16, 2020

“Trial by Wildfire: Will Efforts to Fix Home Insurance in California Stand the Test of Time?” -

Milliman Insight, September 2020

“U.S. Private Flood Insurance: The Journey to Build a New Market.”

Carrier Management, Insurance Journal, September 2019

“Climate change is making Americans anxious. Insurers can help.”

Milliman Insight, April 2019

“Four Ways Hurricane Florence Could Ricochet Across the Insurance Industry”

Milliman Insight, September 14, 2018

“What Could Private Flood Insurance Look Like in New Jersey and New York?”

Milliman Insight, July 24, 2018

“Could Private Flood Insurance be Cheaper than the NFIP?”

Milliman Insight, July 10, 2017

“Why Big Data is a Big Deal” - Insurance ERM, July 13, 2013

“Being Virtual Has Its Virtues” - National Underwriter, September 4, 2000

EXPERT WITNESS ASSIGNMENTS

Howard Mills, Superintendent of Insurance of State of New York vs. Everest Reinsurance Company, expert on behalf of defendant, October 2006.

Mercury Casualty Company, expert in support of rate filing #13-716 being considered by the California Department of Insurance for Mercury’s California Homeowners business, June 2013.

Monterey Bay Military Housing, LLC, et al. v. Pinnacle Monterey LLC, et al., expert in support of plaintiffs Monterey Bay Military Housing, LLC, et al., June 2014.

State Farm Fire & Casualty Company, et al. v. Bruce L. Brown, et al., expert in support of defendants State Farm Fire & Casualty Company, et al. February 2017.

Farmers Insurance Exchange & Mid Century Insurance Company v. Roger Harris, Duane Brown, & Brian Lindsey, expert in support of defendants Farmers Insurance Exchange & Mid Century Insurance Company, November 2018.

American Property Casualty Insurance Association, et al., and Petitioner Intervenor National Association of Mutual Insurance Companies, v. Office of the Insurance Commissioner of the State of Washington and Insurance Commissioner Mike Kreidler, expert in support of petitioner intervenor NAMIC, June 2021.

Taqueria El Primo LLC, et al. v. Farmers Group, Inc., et al., expert in support of defendants Farmers Group, Inc., et al., August 2021.

Farmers Insurance Exchange v. Daniel De Sloover, expert in support of plaintiff & cross-defendant Farmers Insurance Exchange, March 2022.

Eileen-Gayle Coleman and Robert Castro, on behalf of themselves and all others similarly situated v. United Services Automobile Association and USAA General Indemnity Company, expert in support of defendants United Services Automobile Association and USAA General Indemnity Company, May 2022.

Jessica Day, individually and on behalf of all others similarly situated v. GEICO Casualty Company, GEICO Indemnity Company, and GEICO General Insurance Company (“GEICO”), expert in support of defendants GEICO, August 2022.

EXPERT TESTIMONY AT RATE HEARINGS

Table 1 Expert Testimony at Rate Hearings by Nancy Watkins				
Hearing Date	Company	Filing #	Line of Business	State
11/9/2006	St. Johns	FCP 06-11223	HO	Florida
11/16/2006	United P&C	FCP 06-13037	HO	Florida
10/29/2009	Olympus Ins Co	FCP 09-17588	HO	Florida
2/10/2010	First Home	FCP 09-23287	HO	Florida
3/2/2010	ACA Home	FCP 10-00311	HO	Florida
10/21/2010	First Community	FCP 10-14149	DF	Florida
12/7/2010	First Home	FCP 10-17219	HO	Florida
3/10/2011	Olympus	FCP 11-00692	HO	Florida
3/22/2011	First Community	FCP 11-00972	HO	Florida
5/12/2011	Fidelity National	FCP 11-04301	HO	Florida
9/8/2011	Fidelity Fire & Casualty/First Protective	FCP 11-11215	DF	Florida
5/17/2012	Sunshine State	FCP 12-0376 FCP 12-04939	HO DF	Florida
9/20/2012	Citizens Property Insurance Corporation	FCP 12-13991 FCP 12-13992	HO (Coastal) HO	Florida
5/30/2013	Fidelity National	FCP-13-07023	HO	Florida
1/7/2016	State Farm General	CDI 14-8381	HO	California

ARBITRATIONS

Sunshine State Insurance Company (SSIC) and Florida State Board of Administration (SBA), served on an arbitration panel of three actuaries appointed to conduct the resolution of a dispute between the Florida Hurricane Catastrophe Fund and SSIC, November 2010.

Kramer-Wilson Company, Inc. and National General Holding Corp. arbitration. Party arbitrator for Kramer-Wilson Company, Inc., May 2019

EXHIBIT B1

Exhibit 1

United Services Automobile Association
 USAA General Indemnity Company
 Comparison of GIC and United Services Overall Rate Level Calculation

Line Description	Collision			
	(1)	(2)	(3)	(4)
	GIC (Note 1)	United Services (Note 1)	Difference (United Services vs GIC)	Calculation
(1) California Direct Written Premium	63,375,311	134,354,581	112.0%	(2)/(1) - 1
(2) California Direct Earned Premium	60,633,004	132,770,993	119.0%	(2)/(1) - 1
(3) Miscellaneous Fees and Flat Charges not included in Line (2)	0	0	0	(2) - (1)
(4) Historic Losses (Note 2)	48,835,483	84,973,477	74.0%	(2)/(1) - 1
(5) Historic Defense and Cost Containment Expense (DCCE)	0	0	0	(2) - (1)
(6) Earned Exposure Units	134,508	383,386	185.0%	(2)/(1) - 1
(7) Loss Development Factor	0.960	0.936	-2.5%	(2)/(1) - 1
(8) DCCE Development Factor	0.960	0.936	-2.5%	(2)/(1) - 1
(9) Historical Loss Trend Factor	1.094	1.180	7.9%	(2)/(1) - 1
(10) Historical DCCE Trend Factor	1.094	1.180	7.9%	(2)/(1) - 1
(11) Historical Premium Trend Factor	1.044	1.112	6.5%	(2)/(1) - 1
(12) Premium Adjustment Factor	1.000	1.000	0.0%	(2)/(1) - 1
(13) Catastrophe Adjustment Factor	1.000	1.000	0.0%	(2)/(1) - 1
(14) Loss & DCC per Exposure	381.35	244.85	-35.8%	(2)/(1) - 1
(15) Ancillary Income per Exposure	1.94	0.44	-77.3%	(2)/(1) - 1
(16) Prospective Loss Trend	4.9%	9.2%	4.3%	(2) - (1)
(17) Prospective Premium Trend	2.3%	5.8%	3.5%	(2) - (1)
(18) Prospective Net Annual Trend = $[1+(16)]/[1+(17)] - 1$	2.5%	3.2%	0.7%	(2) - (1)
(19) Projected Ult Loss & DCC Ratio	81.0%	63.6%	-17.4%	(2) - (1)
(20) Peril % of Overall Adjusted Earned Premium	36.6%	38.8%	2.2%	(2) - (1)
(21) Peril % of Overall Ultimate Loss & DCC	36.3%	32.5%	-3.8%	(2) - (1)
(22) Min CDI Allowed Profit	-6.6%	-6.6%	0.0%	(2) - (1)
(23) Max CDI Allowed Profit	7.9%	7.9%	0.0%	(2) - (1)
(24) Investment Income Fixed	0.3%	0.3%	0.0%	(2) - (1)
(25) Investment Income Variable	5.2%	5.2%	0.0%	(2) - (1)
(26) Efficiency Standard	24.9%	24.9%	0.0%	(2) - (1)
(27) Min CDI Allowed Indicated Change	-7.5%	-27.2%	-19.7%	(2) - (1)
(28) Max CDI Allowed Indicated Change	11.0%	-12.6%	-23.6%	(2) - (1)
(29) Min CDI Allowed Indicated Premium	435.39	280.47	-35.6%	(2)/(1) - 1
(30) Max CDI Allowed Indicated Premium	522.64	336.67	-35.6%	(2)/(1) - 1

Notes:
 1. Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660568, effective dates 12/28/2017.
 2. Losses from year ending Q2 2016.

EXHIBIT B2

Exhibit 2

**United Services Automobile Association
USAA General Indemnity Company
Comparison of GIC and United Services Factor Weights**

Collision

	(1)	(2)	(3)	(4)	(5)
	GIC (Note 1)	Factor Weight United Services (Note 2)	Relative to Driving Record GIC (Note 3)	United Services (Note 3)	Difference (Note 4)
Mandatory Rating Variables					
Driving Record	113.928	48.477	1.000	1.000	0.000
Annual Mileage	88.054	41.682	0.773	0.860	0.087
Years Driving Experience (YDE)	87.502	41.111	0.768	0.848	0.080
Optional Rating Variables					
Gender	6.757	3.507	0.059	0.072	0.013
Marital Status	50.956	13.967	0.447	0.288	-0.159
Operator Relationship	3.909	2.707	0.034	0.056	0.022
Driver Training Discount	6.322	1.563	0.055	0.032	-0.023
Good Student Discount	21.772	1.986	0.191	0.041	-0.150
Vehicle Usage	0.547	1.120	0.005	0.023	0.018
Multi-Car Discount	37.246	18.555	0.327	0.383	0.056
Combined Vehicle Characteristics	15.713	7.964	0.138	0.164	0.026
Multi-Policy Discount	24.104	14.183	0.212	0.293	0.081
Mature Driver Improvement Course	0.000	0.000	0.000	0.000	0.000
Persistence Discount	10.666	9.892	0.094	0.204	0.110
Frequency Bands	53.744	22.056	0.472	0.455	-0.017
Severity Bands	26.042	17.089	0.229	0.353	0.124

Notes:

1. GIC Collision factor weights are from SERFF filing # USAA-130660523, effective 12/28/2017.
2. United Services Collision factor weights are from SERFF filing # USAA-130660487, effective 12/28/2017.
3. (3) = (1) / (1) Driving Record. Column (4) calculated similarly.
4. (5) = (4) - (3).

EXHIBIT B3

**United Services Automobile Association
USAA General Indemnity Company
Profit Provision Comparison**

Overview

Coverage	(1)		(2)		(3)		(4)		(5)		(6)	
	United Services	GIC	United Services	GIC	United Services	GIC	United Services	GIC	United Services	GIC	United Services	GIC
BI	\$108,290,696	\$77,146,592	72.1%	76.4%	72.1%	76.4%	11.4%	7.1%	11.4%	7.1%	11.4%	7.1%
PD	\$77,969,303	\$38,346,023	71.2%	73.5%	71.2%	73.5%	12.2%	9.9%	12.2%	9.9%	12.2%	9.9%
MedPay	\$16,686,552	\$7,589,687	71.8%	75.1%	71.8%	75.1%	11.7%	8.4%	11.7%	8.4%	11.7%	8.4%
UM	\$86,904,781	\$31,518,026	70.9%	93.2%	70.9%	93.2%	12.6%	-9.7%	12.6%	-9.7%	12.6%	-9.7%
Liab	\$3,858,347	\$1,271,459	75.7%	94.2%	75.7%	94.2%	7.8%	-10.7%	7.8%	-10.7%	7.8%	-10.7%
Coll	\$127,565,626	\$69,840,852	73.2%	72.8%	73.2%	72.8%	7.1%	7.4%	7.1%	7.4%	7.1%	7.4%
Comp	\$25,784,943	\$13,014,208	72.3%	72.8%	72.3%	72.8%	7.9%	7.5%	7.9%	7.5%	7.9%	7.5%
Misc PD	\$8,898,907	\$5,222,053	79.5%	72.9%	79.5%	72.9%	0.7%	7.4%	0.7%	7.4%	0.7%	7.4%
Total (Note 4)	\$455,959,155	\$243,948,900	72.2%	76.9%	72.2%	76.9%	10.1%	5.4%	10.1%	5.4%	10.1%	5.4%

Notes:

1. Columns (1) and (2) are calculated from each coverage specific page as follows: Row (4) x Row (5) x [1 + Row (1)]
2. Columns (3) and (4) are from Row (13) of each coverage specific page.
3. Columns (5) and (6) are from Row (16) of each coverage specific page.
4. Columns (1) and (2) are the sum totals. Columns (3) through (6) are the total proposed premium weighted averages.
5. Underlying data from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.

**United Services Automobile Association
USAA General Indemnity Company
Profit Provision Comparison**

Bodily Injury

Line Description	Source (Note 2)	CDI Template Name	United Services	GIC
(1) Proposed Rate Change	CDI Prior Approval Rate Template	Proposed Rate Change	26.8%	29.5%
(2) Minimum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MIN	-2.9%	5.5%
(3) Maximum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MAX	29.1%	40.4%
(4) Earned Exposures	CDI Prior Approval Rate Template	Exposures_Earned	425,709	304,835
(5) Total Current Rate Level Premium	CDI Prior Approval Rate Template	TCRLP_perExp	\$200.61	\$195.43
(6) Min CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Min Premium	\$194.75	\$205.47
(7) Max CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Max Premium	\$259.09	\$273.35
(8) Selected Proposed Premium	= (5) x [1+(1)]		\$254.38	\$253.08
(9) Loss & DCC per Exposure	CDI Prior Approval Rate Template	CredLoss_perExp	\$194.14	\$205.59
(10) Investment Income Fixed	CDI Prior Approval Rate Template	InvInc_fixed	5.5%	5.5%
(11) Ancillary Income per Exposure	CDI Prior Approval Rate Template	Anc_Inc_perExp	\$0.27	\$1.01
(12) Loss and Fixed Expenses	= (9) x [1-(10)] - (11)		\$183.28	\$193.37
(13) Implied Permissible Loss Ratio	= (12) / (8)		72.1%	76.4%
(14) Efficiency Standard	CDI Prior Approval Rate Template	EffStd_final01	23.8%	23.8%
(15) Investment Income Variable	CDI Prior Approval Rate Template	InvInc_Variable	7.3%	7.3%
(16) Implied Profit Provision Selected	= 1 - (13) - (14) + (15)		11.4%	7.1%
(17) Min CDI Allowed Profit	CDI Prior Approval Rate Template	Min_Profit	-10.6%	-10.6%
(18) Max CDI Allowed Profit	CDI Prior Approval Rate Template	Max_Profit	12.8%	12.8%

Notes:

- Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.
- Row (1) is from CDI Prior Approval Rate Template, tab 2, Summary.
Row (5) is from CDI Prior Approval Rate Template, tab 7.2 Rate Change Calculation, latest year ending 2016 Q2.
Rows (4), (6), (7), (9) through (11), (14), (15), (17) and (18) are from CDI Prior Approval Rate Template, tab 7.1 Rate Change Calculation, Projected.

**United Services Automobile Association
USAA General Indemnity Company
Profit Provision Comparison**

Property Damage

Line Description	Source (Note 2)	CDI Template Name	United Services	GIC
(1) Proposed Rate Change	CDI Prior Approval Rate Template	Proposed Rate Change	26.5%	20.0%
(2) Minimum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MIN	-4.2%	-6.2%
(3) Maximum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MAX	27.4%	24.8%
(4) Earned Exposures	CDI Prior Approval Rate Template	Exposures_Earned	425,709	166,750
(5) Total Current Rate Level Premium	CDI Prior Approval Rate Template	TCRLP_perExp	\$144.78	\$191.63
(6) Min CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Min Premium	\$138.64	\$179.70
(7) Max CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Max Premium	\$184.45	\$239.08
(8) Selected Proposed Premium	= (5) x [1+(1)]		\$183.15	\$229.96
(9) Loss & DCC per Exposure	CDI Prior Approval Rate Template	CredLoss_perExp	\$138.21	\$179.96
(10) Investment Income Fixed	CDI Prior Approval Rate Template	InvInc_fixed	5.5%	5.5%
(11) Ancillary Income per Exposure	CDI Prior Approval Rate Template	Anc_Inc_perExp	\$0.19	\$1.02
(12) Loss and Fixed Expenses	= (9) x [1-(10)] - (11)		\$130.48	\$169.12
(13) Implied Permissible Loss Ratio	= (12) / (8)		71.2%	73.5%
(14) Efficiency Standard	CDI Prior Approval Rate Template	EffStd_final01	23.8%	23.8%
(15) Investment Income Variable	CDI Prior Approval Rate Template	InvInc_Variable	7.3%	7.3%
(16) Implied Profit Provision Selected	= 1 - (13) - (14) + (15)		12.2%	9.9%
(17) Min CDI Allowed Profit	CDI Prior Approval Rate Template	Min_Profit	-10.6%	-10.6%
(18) Max CDI Allowed Profit	CDI Prior Approval Rate Template	Max_Profit	12.8%	12.8%

Notes:

- Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.
- Row (1) is from CDI Prior Approval Rate Template, tab 2, Summary.
- Row (5) is from CDI Prior Approval Rate Template, tab 7.3 Rate Change Calculation, latest year ending 2016 Q2.
- Rows (4), (6), (7), (9) through (11), (14), (15), (17) and (18) are from CDI Prior Approval Rate Template, tab 7.2 Rate Change Calculation, Projected.

**United Services Automobile Association
USAA General Indemnity Company
Profit Provision Comparison**

Medical Payments

Line Description	Source (Note 2)	CDI Template Name	United Services	GIC
(1) Proposed Rate Change	CDI Prior Approval Rate Template	Proposed Rate Change	39.0%	-2.5%
(2) Minimum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MIN	6.1%	-22.1%
(3) Maximum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MAX	41.1%	3.7%
(4) Earned Exposures	CDI Prior Approval Rate Template	Exposures_Earned	614,699	185,194
(5) Total Current Rate Level Premium	CDI Prior Approval Rate Template	TCRLP_perExp	\$19.53	\$42.03
(6) Min CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Min Premium	\$20.70	\$32.68
(7) Max CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Max Premium	\$27.55	\$43.48
(8) Selected Proposed Premium	= (5) x [1+(1)]		\$27.15	\$40.98
(9) Loss & DCC per Exposure	CDI Prior Approval Rate Template	CredLoss_perExp	\$20.64	\$32.76
(10) Investment Income Fixed	CDI Prior Approval Rate Template	InvInc_fixed	5.5%	5.5%
(11) Ancillary Income per Exposure	CDI Prior Approval Rate Template	Anc_Inc_perExp	\$0.03	\$0.21
(12) Loss and Fixed Expenses	= (9) x [1-(10)] - (11)		\$19.49	\$30.76
(13) Implied Permissible Loss Ratio	= (12) / (8)		71.8%	75.1%
(14) Efficiency Standard	CDI Prior Approval Rate Template	EffStd_final01	23.8%	23.8%
(15) Investment Income Variable	CDI Prior Approval Rate Template	InvInc_Variable	7.3%	7.3%
(16) Implied Profit Provision Selected	= 1 - (13) - (14) + (15)		11.7%	8.4%
(17) Min CDI Allowed Profit	CDI Prior Approval Rate Template	Min_Profit	-10.6%	-10.6%
(18) Max CDI Allowed Profit	CDI Prior Approval Rate Template	Max_Profit	12.8%	12.8%

Notes:

1. Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.
2. Row (1) is from CDI Prior Approval Rate Template, tab 2, Summary.
Row (5) is from CDI Prior Approval Rate Template, tab 7.4 Rate Change Calculation, latest year ending 2016 Q2.
Rows (4), (6), (7), (9) through (11), (14), (15), (17) and (18) are from CDI Prior Approval Rate Template, tab 7.3 Rate Change Calculation, Projected.

**United Services Automobile Association
USAA General Indemnity Company
Profit Provision Comparison**

Uninsured Motorists

Line Description	Source (Note 2)	CDI Template Name	United Services	GIC
(1) Proposed Rate Change	CDI Prior Approval Rate Template	Proposed Rate Change	-11.3%	33.0%
(2) Minimum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MIN	-33.3%	31.3%
(3) Maximum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MAX	-11.2%	74.7%
(4) Earned Exposures	CDI Prior Approval Rate Template	Exposures_Earned	1,372,572	425,010
(5) Total Current Rate Level Premium	CDI Prior Approval Rate Template	TCRLP_perExp	\$71.38	\$55.76
(6) Min CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Min Premium	\$47.70	\$73.43
(7) Max CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Max Premium	\$63.45	\$97.69
(8) Selected Proposed Premium	= (5) x [1+(1)]		\$63.32	\$74.16
(9) Loss & DCC per Exposure	CDI Prior Approval Rate Template	CredLoss_perExp	\$47.59	\$73.38
(10) Investment Income Fixed	CDI Prior Approval Rate Template	InvInc_fixed	5.5%	5.5%
(11) Ancillary Income per Exposure	CDI Prior Approval Rate Template	Anc_Inc_perExp	\$0.10	\$0.27
(12) Loss and Fixed Expenses	= (9) x [1-(10)] - (11)		\$44.89	\$69.11
(13) Implied Permissible Loss Ratio	= (12) / (8)		70.9%	93.2%
(14) Efficiency Standard	CDI Prior Approval Rate Template	EffStd_final01	23.8%	23.8%
(15) Investment Income Variable	CDI Prior Approval Rate Template	InvInc_Variable	7.3%	7.3%
(16) Implied Profit Provision Selected	= 1 - (13) - (14) + (15)		12.6%	-9.7%
(17) Min CDI Allowed Profit	CDI Prior Approval Rate Template	Min_Profit	-10.6%	-10.6%
(18) Max CDI Allowed Profit	CDI Prior Approval Rate Template	Max_Profit	12.8%	12.8%

Notes:

- Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.
- Row (1) is from CDI Prior Approval Rate Template, tab 2, Summary.
Row (5) is from CDI Prior Approval Rate Template, tab 7.5 Rate Change Calculation, latest year ending 2016 Q2.
Rows (4), (6), (7), (9) through (11), (14), (15), (17) and (18) are from CDI Prior Approval Rate Template, tab 7.4 Rate Change Calculation, Projected.

**United Services Automobile Association
USAA General Indemnity Company
Profit Provision Comparison**

Liability

Line Description	Source (Note 2)	CDI Template Name	United Services	GIC
(1) Proposed Rate Change	CDI Prior Approval Rate Template	Proposed Rate Change	-15.0%	-26.0%
(2) Minimum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MIN	-31.6%	-26.0%
(3) Maximum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MAX	-9.0%	-1.6%
(4) Earned Exposures	CDI Prior Approval Rate Template	Exposures_Earned	740,833	127,064
(5) Total Current Rate Level Premium	CDI Prior Approval Rate Template	TCRLP_perExp	\$6.13	\$13.52
(6) Min CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Min Premium	\$4.19	\$10.01
(7) Max CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Max Premium	\$5.57	\$13.32
(8) Selected Proposed Premium	= (5) x [1+(1)]		\$5.21	\$10.01
(9) Loss & DCC per Exposure	CDI Prior Approval Rate Template	CredLoss_perExp	\$4.17	\$9.96
(10) Investment Income Fixed	CDI Prior Approval Rate Template	InvInc_fixed	5.5%	5.5%
(11) Ancillary Income per Exposure	CDI Prior Approval Rate Template	Anc_Inc_perExp	\$0.00	\$0.00
(12) Loss and Fixed Expenses	= (9) x [1-(10)] - (11)		\$3.94	\$9.42
(13) Implied Permissible Loss Ratio	= (12) / (8)		75.7%	94.2%
(14) Efficiency Standard	CDI Prior Approval Rate Template	EffStd_final01	23.8%	23.8%
(15) Investment Income Variable	CDI Prior Approval Rate Template	InvInc_Variable	7.3%	7.3%
(16) Implied Profit Provision Selected	= 1 - (13) - (14) + (15)		7.8%	-10.7%
(17) Min CDI Allowed Profit	CDI Prior Approval Rate Template	Min_Profit	-10.6%	-10.6%
(18) Max CDI Allowed Profit	CDI Prior Approval Rate Template	Max_Profit	12.8%	12.8%

Notes:

- Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.
- Row (1) is from CDI Prior Approval Rate Template, tab 2, Summary.
Row (5) is from CDI Prior Approval Rate Template, tab 7.6 Rate Change Calculation, latest year ending 2016 Q2.
Rows (4), (6), (7), (9) through (11), (14), (15), (17) and (18) are from CDI Prior Approval Rate Template, tab 7.5 Rate Change Calculation, Projected.

**United Services Automobile Association
USAA General Indemnity Company
Profit Provision Comparison**

Collision

Line Description	Source (Note 2)	CDI Template Name	United Services	GIC
(1) Proposed Rate Change	CDI Prior Approval Rate Template	Proposed Rate Change	-13.6%	10.3%
(2) Minimum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MIN	-27.2%	-7.5%
(3) Maximum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MAX	-12.6%	11.0%
(4) Earned Exposures	CDI Prior Approval Rate Template	Exposures_Earned	383,386	134,508
(5) Total Current Rate Level Premium	CDI Prior Approval Rate Template	TCRLP_perExp	\$385.11	\$470.75
(6) Min CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Min Premium	\$280.47	\$435.39
(7) Max CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Max Premium	\$336.67	\$522.64
(8) Selected Proposed Premium	= (5) x [1+(1)]		\$332.73	\$519.23
(9) Loss & DCC per Exposure	CDI Prior Approval Rate Template	CredLoss_perExp	\$244.85	\$381.35
(10) Investment Income Fixed	CDI Prior Approval Rate Template	InvInc_fixed	0.3%	0.3%
(11) Ancillary Income per Exposure	CDI Prior Approval Rate Template	Anc_Inc_perExp	\$0.44	\$1.94
(12) Loss and Fixed Expenses	= (9) x [1-(10)] - (11)		\$243.56	\$378.09
(13) Implied Permissible Loss Ratio	= (12) / (8)		73.2%	72.8%
(14) Efficiency Standard	CDI Prior Approval Rate Template	EffStd_final01	24.9%	24.9%
(15) Investment Income Variable	CDI Prior Approval Rate Template	InvInc_Variable	5.2%	5.2%
(16) Implied Profit Provision Selected	= 1 - (13) - (14) + (15)		7.1%	7.4%
(17) Min CDI Allowed Profit	CDI Prior Approval Rate Template	Min_Profit	-6.6%	-6.6%
(18) Max CDI Allowed Profit	CDI Prior Approval Rate Template	Max_Profit	7.9%	7.9%

Notes:

- Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.
- Row (1) is from CDI Prior Approval Rate Template, tab 2, Summary.
Row (5) is from CDI Prior Approval Rate Template, tab 7.7 Rate Change Calculation, latest year ending 2016 Q2.
Rows (4), (6), (7), (9) through (11), (14), (15), (17) and (18) are from CDI Prior Approval Rate Template, tab 7.6 Rate Change Calculation, Projected.

**United Services Automobile Association
USAA General Indemnity Company
Profit Provision Comparison**

Comprehensive

Line Description	Source (Note 2)	CDI Template Name	United Services	GIC
(1) Proposed Rate Change	CDI Prior Approval Rate Template	Proposed Rate Change	-25.2%	-45.0%
(2) Minimum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MIN	-37.7%	-53.9%
(3) Maximum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MAX	-25.2%	-44.7%
(4) Earned Exposures	CDI Prior Approval Rate Template	Exposures_Earned	400,025	140,128
(5) Total Current Rate Level Premium	CDI Prior Approval Rate Template	TCRLP_perExp	\$86.14	\$168.86
(6) Min CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Min Premium	\$53.70	\$77.85
(7) Max CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Max Premium	\$64.46	\$93.45
(8) Selected Proposed Premium	= (5) x [1+(1)]		\$64.46	\$92.87
(9) Loss & DCC per Exposure	CDI Prior Approval Rate Template	CredLoss_perExp	\$46.90	\$68.55
(10) Investment Income Fixed	CDI Prior Approval Rate Template	InvInc_fixed	0.3%	0.3%
(11) Ancillary Income per Exposure	CDI Prior Approval Rate Template	Anc_Inc_perExp	\$0.10	\$0.71
(12) Loss and Fixed Expenses	= (9) x [1-(10)] - (11)		\$46.63	\$67.60
(13) Implied Permissible Loss Ratio	= (12) / (8)		72.3%	72.8%
(14) Efficiency Standard	CDI Prior Approval Rate Template	EffStd_final01	24.9%	24.9%
(15) Investment Income Variable	CDI Prior Approval Rate Template	InvInc_Variable	5.2%	5.2%
(16) Implied Profit Provision Selected	= 1 - (13) - (14) + (15)		7.9%	7.5%
(17) Min CDI Allowed Profit	CDI Prior Approval Rate Template	Min_Profit	-6.6%	-6.6%
(18) Max CDI Allowed Profit	CDI Prior Approval Rate Template	Max_Profit	7.9%	7.9%

Notes:

- Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.
- Row (1) is from CDI Prior Approval Rate Template, tab 2, Summary.
Row (5) is from CDI Prior Approval Rate Template, tab 7.8 Rate Change Calculation, latest year ending 2016 Q2.
Rows (4), (6), (7), (9) through (11), (14), (15), (17) and (18) are from CDI Prior Approval Rate Template, tab 7.7 Rate Change Calculation, Projected.

**United Services Automobile Association
USAA General Indemnity Company
Profit Provision Comparison**

Miscellaneous Physical Damage (TL, WoCD, RR)

Line Description	Source (Note 2)	CDI Template Name	United Services	GIC
(1) Proposed Rate Change	CDI Prior Approval Rate Template	Proposed Rate Change	-27.3%	-34.7%
(2) Minimum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MIN	-33.4%	-45.2%
(3) Maximum Allowed Rate Change	CDI Prior Approval Rate Template	CHANGE_AT_MAX	-20.1%	-34.2%
(4) Earned Exposures	CDI Prior Approval Rate Template	Exposures_Earned	721,025	249,503
(5) Total Current Rate Level Premium	CDI Prior Approval Rate Template	TCRLP_perExp	\$16.98	\$32.05
(6) Min CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Min Premium	\$11.31	\$17.57
(7) Max CDI Allowed Indicated Premium	CDI Prior Approval Rate Template	Max Premium	\$13.57	\$21.09
(8) Selected Proposed Premium	= (5) x [1+(1)]		\$12.34	\$20.93
(9) Loss & DCC per Exposure	CDI Prior Approval Rate Template	CredLoss_perExp	\$9.85	\$15.31
(10) Investment Income Fixed	CDI Prior Approval Rate Template	InvInc_fixed	0.3%	0.3%
(11) Ancillary Income per Exposure	CDI Prior Approval Rate Template	Anc_Inc_perExp	\$0.00	\$0.00
(12) Loss and Fixed Expenses	= (9) x [1-(10)] - (11)		\$9.82	\$15.26
(13) Implied Permissible Loss Ratio	= (12) / (8)		79.5%	72.9%
(14) Efficiency Standard	CDI Prior Approval Rate Template	EffStd_final01	24.9%	24.9%
(15) Investment Income Variable	CDI Prior Approval Rate Template	InvInc_Variable	5.2%	5.2%
(16) Implied Profit Provision Selected	= 1 - (13) - (14) + (15)		0.7%	7.4%
(17) Min CDI Allowed Profit	CDI Prior Approval Rate Template	Min_Profit	-6.6%	-6.6%
(18) Max CDI Allowed Profit	CDI Prior Approval Rate Template	Max_Profit	7.9%	7.9%

Notes:

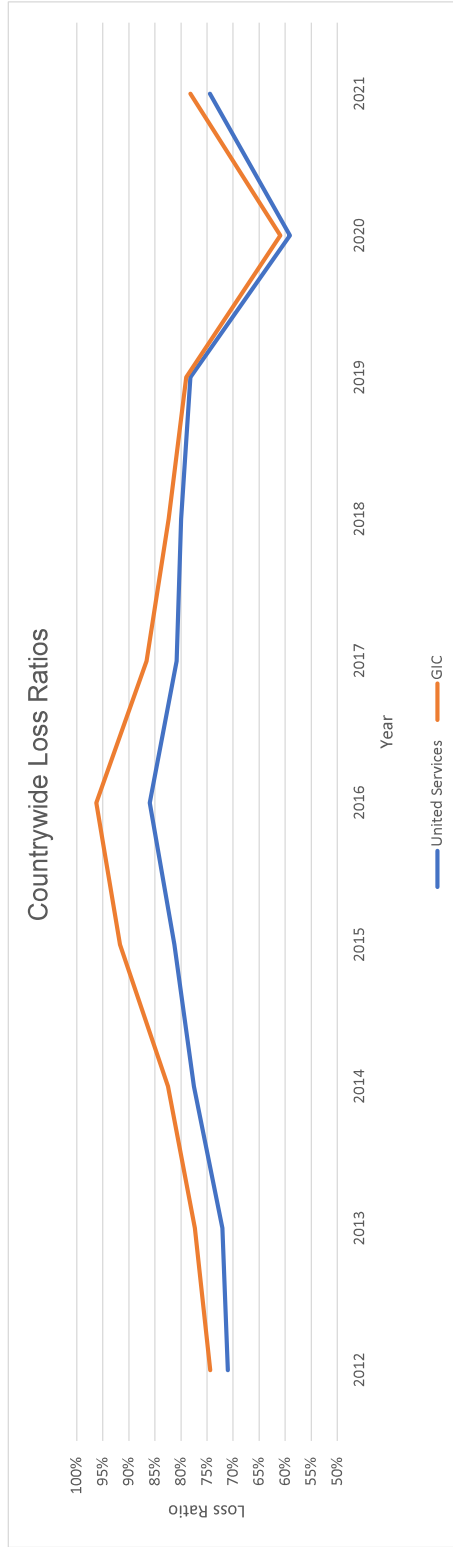
- Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660589, effective dates 12/28/2017.
- Row (1) is from CDI Prior Approval Rate Template, tab 2, Summary.
Row (5) is from CDI Prior Approval Rate Template, tab 7.9 Rate Change Calculation, latest year ending 2016 Q2.
Rows (4), (6), (7), (9) through (11), (14), (15), (17) and (18) are from CDI Prior Approval Rate Template, tab 7.8 Rate Change Calculation, Projected.

EXHIBIT B4

United Services Automobile Association
USAA General Indemnity Company
Loss Ratio Comparison

Countrywide

Year	United Services			GIC			Loss Ratio Difference = (8) - (4)	
	(1) Written Premium	(2) Earned Premium	(3) Incurred Loss & DCC	(4) Loss Ratio = (3) / (2)	(5) Written Premium	(6) Earned Premium		(7) Incurred Loss & DCC
2012	\$3,732,106,277	\$3,704,265,397	\$2,630,604,689	71.0%	\$983,730,823	\$920,748,750	\$684,722,077	74.4%
2013	3,849,691,683	3,821,886,035	2,754,679,544	72.1%	1,339,974,115	1,241,812,051	960,534,664	77.3%
2014	3,908,139,883	3,906,877,372	3,028,485,068	77.5%	1,697,455,690	1,612,426,835	1,330,196,250	82.5%
2015	3,988,304,932	3,961,191,958	3,219,956,755	81.3%	2,041,578,697	1,943,683,207	1,783,274,850	91.7%
2016	4,213,412,428	4,148,191,466	3,567,990,192	86.0%	2,430,402,637	2,327,180,133	2,239,739,734	96.2%
2017	4,564,384,767	4,465,156,940	3,608,393,507	80.8%	2,856,322,649	2,744,099,251	2,376,489,937	86.6%
2018	4,887,067,825	4,824,727,642	3,859,201,531	80.0%	3,207,708,089	3,134,090,437	2,581,475,503	82.4%
2019	5,072,429,264	5,027,948,458	3,930,981,829	78.2%	3,359,655,499	3,326,962,188	2,628,093,250	79.0%
2020	5,184,853,285	5,170,383,055	3,056,690,796	59.1%	3,447,864,962	3,439,153,830	2,096,762,139	61.0%
2021	5,137,414,305	5,152,367,332	3,834,663,021	74.4%	3,379,725,057	3,399,857,446	2,659,841,127	78.2%
				4-Year Wtd Average: 72.8%				4-Year Wtd Average: 74.9%
				10-Year Wtd Average: 75.8%				10-Year Wtd Average: 80.3%

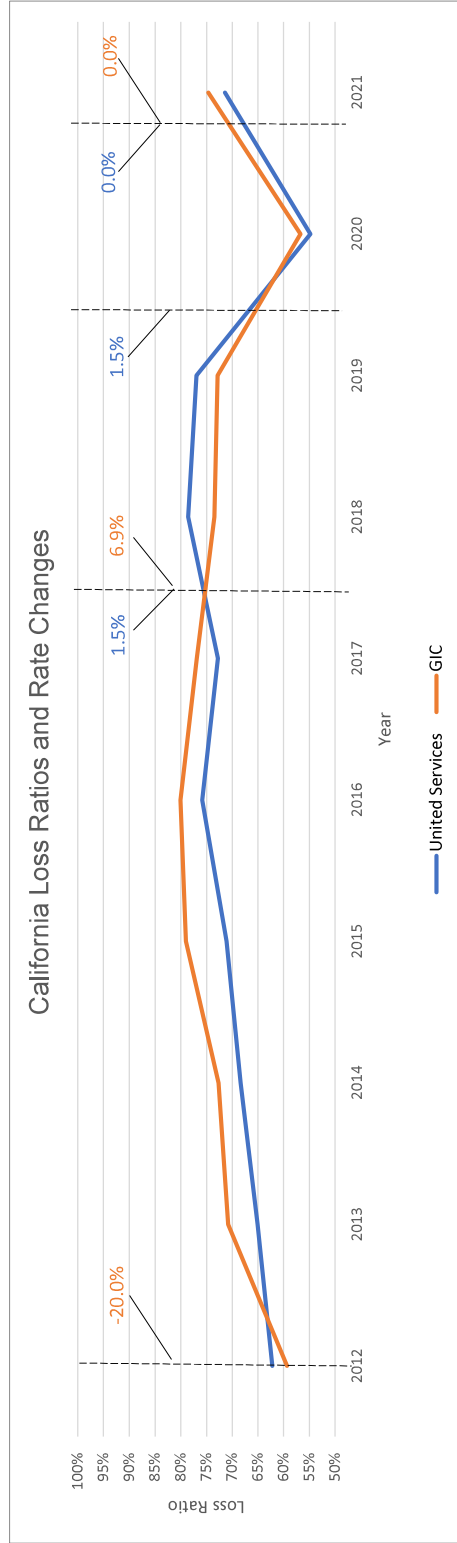


Notes:
1. Data from Exhibit of Premium and Losses (Statutory Page 14) - Grand Total for United Services Automobile Association (NAIC #25941) and USAA General Indemnity Co. (NAIC #18600).
2. Losses evaluated as of 12/31 for each year.

United Services Automobile Association
USAA General Indemnity Company
Loss Ratio Comparison

California

Year	United Services			GIC			Loss Ratio Difference = (8) - (4)		
	(1) Written Premium	(2) Earned Premium	(3) Incurred Loss & DCC	(4) Loss Ratio = (3) / (2)	(5) Written Premium	(6) Earned Premium		(7) Incurred Loss & DCC	(8) Loss Ratio = (7) / (6)
2012	\$336,508,204	\$334,199,330	\$207,868,793	62.2%	\$72,526,114	\$69,200,672	\$41,081,200	59.4%	-2.8%
2013	342,533,226	341,122,109	222,103,757	65.1%	102,194,464	93,886,330	66,474,370	70.8%	5.7%
2014	349,381,237	347,607,217	237,611,821	68.4%	134,139,770	126,293,357	91,737,630	72.6%	4.3%
2015	358,929,050	356,763,896	253,680,406	71.1%	164,747,108	156,979,433	124,015,570	79.0%	7.9%
2016	368,077,428	365,720,764	277,218,665	75.8%	195,160,727	187,825,418	150,366,379	80.1%	4.3%
2017	379,326,585	376,347,434	274,039,503	72.8%	227,585,123	218,541,878	168,035,409	76.9%	4.1%
2018	392,795,416	389,553,078	305,948,362	78.5%	272,357,013	262,990,832	193,191,533	73.5%	-5.1%
2019	406,429,074	402,095,808	309,437,446	77.0%	295,224,279	288,483,289	210,223,870	72.9%	-4.1%
2020	410,717,845	411,280,193	225,411,136	54.8%	313,175,699	310,591,293	176,185,716	56.7%	1.9%
2021	399,800,498	400,547,028	285,967,316	71.4%	313,403,228	312,683,356	233,442,588	74.7%	3.3%
				4-Year Wtd Average: 10-Year Wtd Average:				4-Year Wtd Average: 10-Year Wtd Average:	
				70.3% 69.8%				69.2% 71.8%	-1.1% 2.0%



Notes:
1. Data from company's Exhibit of Premium and Losses (Statutory Page 14) - California for United Services Automobile Association (NAIC #25941) and USAA General Indemnity Co. (NAIC #18600).
2. Losses evaluated as of 12/31 for each year.

United Services Automobile Association
USAA General Indemnity Company
Loss Ratio Comparison

California 15-Year Filing Timeline

(1)	(2)			(3)	(4)	(5)	(6)	(7)	(8)
	United Services								
Filing Number (Note 1)	Filing Status	Latest Experience Period (Note 2)	Effective Date (Note 3)	Rate Change (Note 3)	Filing Number (Note 1)	Filing Status	Latest Experience Period (Note 2)	Effective Date (Note 3)	Rate Change (Note 3)
USAA-125258826	Approved	12/31/2006	3/4/2009	-6.7%	USAA-126501745	Approved	6/30/2009	8/1/2010	-12.2%
USAA-130660589	Approved	6/30/2016	12/28/2017	1.5%	USAA-127200120	Approved	12/31/2010	2/13/2012	-20.0%
USAA-131769162	Approved	9/30/2018	10/1/2019	1.5%	USAA-130660642	Approved	6/30/2016	12/28/2017	6.9%
USAA-132398216	Withdrawn	9/30/2019	3/4/2021	0.0%	USAA-132398570	Withdrawn	9/30/2019	3/4/2021	0.0%

Notes:

1. Filings submitted to the CA Department of Insurance.
2. Data from Prior Approval Template for each filing.
3. Data from SERFF

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

EILEEN-GAYLE COLEMAN and
ROBERT CASTRO, on behalf of
themselves and all others similarly
situated,

Case No. 3:21-cv-217-RSH-KSC

Plaintiffs,

v.

UNITED SERVICES AUTOMOBILE
ASSOCIATION and USAA GENERAL
INDEMNITY COMPANY

Defendants.

REBUTTAL REPORT OF NANCY WATKINS

Qualifications

My name is Nancy Watkins, and my business address is 650 California Street, San Francisco, California. I am a Principal and Consulting Actuary with Milliman, Inc. (“Milliman”). I am a Fellow of the Casualty Actuarial Society (“CAS”) and a Member of the American Academy of Actuaries (“AAA”). Milliman is among the world’s largest providers of actuarial, risk management, and related technology and data solutions. I joined Milliman 1997 as a Consulting Actuary and was made a Principal in 1999; currently I co-manage a practice of 38 actuaries and professionals in San Francisco. I have presented on technical ratemaking and other actuarial topics at many industry and regulatory conferences and have submitted and/or worked on hundreds of rate filings in the past 25 years, mostly for residential property and personal automobile insurance.

A complete statement of my education, employment, and academic credentials is included in the curriculum vitae filed as Attachment A with this testimony.

I meet the Qualification Standards of the American Academy of Actuaries to render the opinions contained herein.

My 2022 billable rate is \$825 per hour payable to Milliman, Inc. for my actuarial consulting services, including this expert witness support. My payment is not dependent on the outcome of this matter.

Background and Scope of Work

I¹ have been asked by counsel for United Services Automobile Association (“United Services”) and USAA General Indemnity Company (“GIC”) (collectively, “USAA”) to provide an expert report in the matter of Eileen-Gayle Coleman, and Robert Castro, on behalf of themselves and all others similarly situated (“Plaintiffs”) v. United Services Automobile Association and USAA General Indemnity Company (collectively, “Defendants”), Case No. 3:21-cv-00217-RSH-KSC, pending in the United States District Court for the Southern District of California.

United Services and GIC write Private Passenger Auto (“PPA”) policies in California. Each of the companies insures a different segment of the military, as detailed in Defendants’ California Auto Company Placement Rules (“Placement Rules”) filed with the California Department of Insurance (“CDI”).² Generally speaking, United Services insures higher-paygrade officers and enlisted personnel (E-7 and above), and GIC insures lower-paygrade officers and enlisted personnel (E-1 through E-6). United Services’ and GIC’s current and historical rates have both been reviewed and approved by the CDI.

Plaintiffs allege that USAA’s practice of segmenting policyholders according to the Placement Rules -- and then charging higher base rates for GIC compared with United Services -- violates section 1861.16(b) of the California Insurance Code, which requires auto insurers to offer a statutory “good driver” a policy from the insurer with the lowest rates within a commonly controlled group of companies. Plaintiffs further allege that segmenting policyholders according to the Placement Rules -- and then charging higher base rates for GIC compared with United Services -- discriminates against enlisted personnel based on their military status in violation of California’s anti-discrimination laws.

The Plaintiffs seek to represent the following classes of GIC insureds:

- Good Driver Class: Enlisted persons who at any time on or after December 28, 2017, purchased or renewed an automobile insurance policy, paid more for that policy than they would have paid in United Services, had collision coverage on one or more vehicles, and covered one or more drivers who qualified as Good Drivers under CIC 1861.025.
- Discrimination Class: Enlisted persons who at any time on or after December 28, 2017, purchased or renewed an automobile insurance policy, paid more for that policy than they would have paid in United Services, and had collision coverage on one or more vehicles.

The Plaintiffs have engaged Jonathan Griglack and Allan I. Schwartz to calculate the damages for each individual GIC policyholder on a class-wide basis. I submitted a declaration dated 6/1/2022 evaluating the findings and opinions provided by Griglack and Schwartz in April 2022. On 10/17/2022, I also provided background information and commentary on PPA ratemaking,

¹ Throughout this report, references to “I” or “my” are intended to include Milliman employees working under my direction to assist in this assignment, including internal peer reviewers. The opinions stated in this report are my opinions.

² For example, company placement rules were submitted as part of the rate filings USAA-130660589 and USAA-130660642 for United Services and GIC, respectively.

actuarial standards and principles, and commentary on publicly available data on actual and target profits for GIC and United Services relevant to allegations by Plaintiffs.

In this report, I have been asked to evaluate, from an actuarial perspective, the findings and opinions expressed in the reports submitted by Mr. Griglack and Mr. Schwartz on 10/17/2022.

Basis of Analysis

My report is based on a review of the following data and information:

- Plaintiffs' Notice of Motion and Motion for Class Certification, dated 4/8/2022
- Plaintiffs' Motion to Amend Proposed Class Definitions, dated 10/12/2022
- Declaration of Jonathan Griglack, dated 4/6/2022
- Deposition of Jonathan Griglack, 4/16/2022
- Amended Declaration of Jonathan Griglack, dated 5/23/2022
- Declaration of Jonathan Griglack, dated 6/23/2022
- Report of Jonathan Griglack, dated 10/17/2022 including Excel files:
 - App C-5 - Results 3-31-2018 Final.xlsx
 - App C-6 - Results 9-30-2018 Final.xlsx
 - App C-7 - Results 3-31-2019 Final.xlsx
 - App C-8 - Results 9-30-2019 Final.xlsx
 - App C-9 - Results 3-31-2020 Final.xlsx
 - App C-10 - Results 9-30-2020 Final.xlsx
 - App C-11 - Results 3-31-2021 Final.xlsx
 - App C-12 - Results 9-30-2021 Final.xlsx
- Declaration of Allan I. Schwartz, dated 4/7/2022
- Response Declaration of Allan I. Schwartz, dated 6/24/2022
- Report of Allan I. Schwartz, dated 10/17/2022
- Plaintiffs' policy declaration pages:
 - Castro 47186412_1_UW Files.pdf
 - Castro 47859054_1_UW Files.pdf
 - 47185459_1_UW Files.pdf
- Excel file from Plaintiff: SGRisk Limited 10-2019 Comparisons (Rates from 19-14).xlsx
- Publicly available California rate filings for United Services and GIC:
 - GIC SERFF filing # USAA-130660642, effective 12/28/2017
 - United Services SERFF filing #USAA-130660589, effective 12/28/2017
- Publicly available California class plan filings for United Services and GIC:
 - GIC SERFF filing # USAA-130660523, effective 12/28/2017
 - United Services SERFF filing # USAA-130660487, effective 12/28/2017
- California Code of Regulations ("CCR")
- California Insurance Code ("CIC")

Summary of Findings and Opinions

My findings after reviewing the 10/17/22 reports of Mr. Griglack and Mr. Schwartz are as follows:

- Griglack’s premium calculations remain flawed and incomplete and should not be relied upon.
- Griglack’s rating errors result in biased and overstated damage estimates.
- Schwartz’s damage methodologies remain fundamentally unsound and should not be relied upon, as they are inconsistent with the Plaintiffs’ claims, actuarial principles, and applicable laws and regulations.

Overview of Damage Calculation Methodologies

Plaintiffs have proposed two damage theories, one that measures the difference between the GIC and United Services premiums based on the companies’ filed and approved base rates and rating factors and one that measures the difference between the GIC premium and what the premium purportedly would have been if the United Services base rates were raised to the extent necessary to bring in the same amount of total premium (Plaintiffs’ Notice of Motion and Motion for Class Certification, page 20).

In his declaration dated 4/7/2022, Schwartz proposed a “Primary” (“RP1”) and an “Alternate” (“RP2”) method for identifying injured GIC policyholders and calculating damages. Both methods require calculating both GIC and hypothetical United Services premiums for each GIC insured vehicle. The processes to perform these premium calculations are described in Griglack’s declarations and reports. For each company, the total premium for each policyholder is calculated by adding up Griglack’s estimated premiums across all the coverages and vehicles on the policy.

Schwartz’s Primary Damages methodology defines injury (and calculates damage) to each GIC policyholder as the GIC total premium minus the hypothetical United Services total premium, and if the GIC total premium was lower than the hypothetical United Services total premium, the damages are \$0. In his declaration dated 6/24/2022, Schwartz clarified that the Primary Damages methodology is the measure of damages for the Good Driver class.

Schwartz’s Alternate Damages methodology adjusts the dollar amount of United Services hypothetical premiums before calculating the difference to the GIC premiums. In his declaration dated 6/24/2022, Schwartz stated that the Alternate Damages methodology is applicable to the Discrimination class. In this calculation, the hypothetical United Services premiums are increased to “increase the dollar amount of USAA premium by the dollar amount of decrease in premium for GIC, thereby balancing against each other” (Schwartz 4/7/2022, paragraph 21), resulting in lower damages than the Primary Damages methodology. In his 10/17/2022 report, Schwartz provides damage calculations for the Discrimination class by taking the difference in the total United Services and GIC premiums for all evaluation dates combined, a method which was not described in his prior reports. Schwartz uses both the Alternate Damages methodology and the new “modified” version of the Primary Damages methodology to calculate damages for the Discrimination class.

Griglack's premium calculations are flawed and incomplete

Schwartz's proposed damage calculations rest on the assumption that Griglack is calculating accurate estimates of the actual GIC premium charged and the "required" United Services premium. However, Griglack's calculations remain flawed and incomplete and should not be relied upon, for the reasons described below.

Griglack and Schwartz's methodology does not consider mid-term changes

Schwartz and Griglack's use of "snapshots" are both incomplete calculations in that they do not take mid-term changes in premium into account. For accurate calculations of actual premiums charged, the algorithm would need to take in data at transaction level detail and incorporate complex calculations far beyond the simplistic methods proposed by Griglack and Schwartz. In his 4/16/2022 deposition, Griglack proposed a "ratio approach" to account for mid-term changes and cancellations that would affect actual collected premium (pages 128 – 132). However, Griglack did not mention or use the ratio approach in his 10/17/22 analysis.

In his 6/24/2022 declaration, Griglack argued that consideration of mid-term changes is immaterial because:

- the changes impact GIC and United Services similarly,
- the "average" change occurs halfway through the policy, and
- mid-term changes happen infrequently.

There are numerous weaknesses in this argument that undermine Griglack's assertion of the immateriality of omitting mid-term changes from his calculation.

First, it is true that when mid-term changes are made in risk characteristics where GIC and United Services are using similar rating factors, the resulting percentage changes in premium by coverage will also be similar. However, unless the premiums before the change are similar, the dollar differences in premiums before and after the change will not be similar. For example, if the starting premiums for GIC and United Services are \$1000 and \$800, respectively, and both are impacted by a mid-term change with a similar 25% premium decrease, the new premiums after the change would be \$750 for GIC and \$600 for United Services. The dollar difference in premiums between the companies, which is the basis for the damage calculations, changes from \$200 (\$1000 minus \$800) to \$150 (\$750 minus \$600). Since it is the dollar differences from Griglack's premium estimates that are used by Schwartz to calculate the damages, there can be material errors in the damage calculations when mid-term changes have occurred. Ignoring the mid-term change in our example would overstate Schwartz's damage calculation by \$50 (\$200 versus \$150), or 33%.

Second, to the extent that a mid-term change impacts only certain coverages, it is possible for the change to result in a different percentage change on the total policy premium between GIC and United Services, even if they use identical rating factors.

Third, Griglack has presented no data supporting the assertion that the “average” change occurs halfway through the policy, has not described how this relates to the snapshot dates he is using, and has not explained why this assumption is appropriate. As summarized in Exhibit 1, Pages 2 and 3, the changes made by the two Plaintiffs to their own policies occur at all different intervals between snapshot dates. Assuming the “average” change occurs halfway through the policy does not make Griglack’s calculated premiums accurate for an individual policyholder.

Fourth, Griglack states that changes in limits are relatively infrequent (Griglack 6/24/2022, paragraph 10); however, changing policy limits is just one example of a mid-term change. For example, as summarized in Exhibit 1, the two Plaintiffs added and dropped both vehicles and coverages, and changed operator status, vehicle location and coverage limits. Sometimes these changes occurred on multiple dates within a given snapshot period. In my experience, this is not unusual; policyholders make various changes to their policies in the middle of a policy period, resulting in premium changes. These numerous changes to their policies impacted the actual premiums earned versus the initial “snapshot” premiums quoted based on the information considered at policy inception, resulting in material miscalculations of damages. Griglack’s calculations have no provision to reflect this complexity, and neither Griglack nor Schwartz presented data as to mid-policy changes, nor have they demonstrated that the snapshot approach provides accurate estimates of dollar damages for individual policyholders.

Because we do not have the necessary data on mid-term changes for all policyholders in the class, the impact of omitting this information cannot be reasonably quantified. However, we do have sufficient information on the Plaintiffs’ policies to perform this quantification and illustrate how the damage calculations based on Griglack’s snapshot premium estimates can be materially erroneous.

To illustrate the impact of mid-term changes, I have summarized the premiums from various declaration pages for Plaintiffs Castro and Coleman for the proposed class period (policies renewed on or after December 28, 2017) in Exhibit 1, Pages 2 and 3. I used this information to calculate the actual premiums earned during each six-month period between the “snapshots” used by Griglack.³ Taking into account the timing and magnitude of changes made by the Plaintiffs, the actual premiums earned are shown in Column (7) and summed in Column (8) of Pages 2 and 3.

As shown in Exhibit 1, Page 4, Griglack’s snapshot calculations for GIC compared to the given 6-month GIC premiums were within -2.5% to +0.1% for Castro and -0.2% to +0.1% for Coleman. The maximum absolute dollar error is approximately \$31 for Castro and \$3 for Coleman.

Exhibit 1, Page 1 shows the Primary Damages (for the Good Driver class) resulting from Griglack’s calculated snapshot premiums as compared to the same damages calculation using the actual earned premiums. Columns (8) and (9) on Page 1 show the dollar and percentage

³ Because Plaintiff Coleman terminated the California policy on 9/27/2021, her actual earned premium for the period 4/1/2021 through 10/1/2021 does not reflect a full six months of premium, and she does not have any premium for the six months starting 10/1/2021. Also, I was not able to perform the actual earned premium calculations for the six months following the 10/1/2021 snapshot for Plaintiff Castro because not all the mid-term transactions in that period were available.

differences for each six-month period. For Plaintiff Castro, Schwartz's total damages for the seven 6-month periods combined are understated by about \$35 (-2%); for individual policy periods the margin of error ranged from -14% to +6%. For Plaintiff Coleman, Schwartz's total damage estimates are overstated by about \$114 (5%). For individual 6-month periods, the margin of error ranged from -6% to +47%. The maximum absolute dollar error is approximately \$39 for Castro and \$114 for Coleman.

Here, in the Plaintiffs' examples, which are purported to be representative of the class members, there were many mid-term changes which impacted their premiums. As a result of such changes, the actual premiums earned, which are a key input to Schwartz's proposed damage calculation, were materially different from Griglack's snapshot premiums calculated at a specific point in time. As shown in the Plaintiffs' examples, the differences in the damage estimates, especially at the 6-month level used for the Good Driver damage calculation, can be much more material than the errors in the snapshot estimates. If these Plaintiffs are representative of the Classes, ignoring the mid-term changes is a fundamental flaw that undermines the reliability of the resulting calculations and could materially impact the alleged damages for individual policyholders.

Griglack does not update driver assignments

To calculate a premium for a vehicle within a household, driver characteristics such as marital status and years driving experience are associated with a vehicle for the purpose of calculating the vehicle premium. This process is known as "driver assignment." As Griglack notes, the driver assignment algorithm is the same for GIC and United Services. I have summarized the algorithm below:

- i. Sort vehicles by Vehicle Base Premium, calculated as the product of the Bodily Injury coverage base rate, pure premium band relativity, increased limit factor, liability symbol relativity, model year relativity, vehicle age relativity, annual mileage factor, usage factor, and storage discount.
- ii. Sort drivers by Operator Base Premium, calculated as the product of the Bodily Injury factors for years driving experience, marital status, driving training discount, good student discount, mature driver improvement course discount, occasional operator discount, away at school discount, accident factor, conviction factor, premier operator discount, and good driver discount.
- iii. Assign operators to vehicles using Operator Status (principal or occasional), Vehicle Base Premium, and Operator Base Premium.
- iv. If number of vehicles exceeds the number of operators, rate the remaining vehicles without an assigned operator using "excess vehicle" factors shown in the rate tables.

While the driver assignment algorithm is the same for GIC and United Services, the outcomes may not necessarily be the same. The outcomes can differ because of differences in the factors used by GIC and United Services to calculate the Vehicle Base Premiums and Operator Base Premiums. And if the driver assignment changes, different driver-related factors such as years

driving experience, marital status, etc. should be applied when calculating the vehicle premium, resulting in different premiums.

In Exhibit 2, I show two examples of how the same operator characteristics could result in a different sort order for the Operator Base Premium in United Services compared to GIC, potentially resulting in different driver assignments. Based on my review of Griglack's work, it appears that he has failed to consider the impact of driver reassignments to calculate United Services premiums, nor has he disclosed any quantification of the impact of this assumption on the accuracy of his premium calculations.

If Griglack had properly applied driver assignments, he likely would have ended up calculating different United Services premiums for some policyholders, in turn changing the determination of injury and amount of damage calculated.

Griglack's rating errors result in biased and overstated damage estimates

Griglack's 4/6/2022 declaration states "when we are provided with accurate data concerning each GIC policyholder, we will be able to calculate exactly what United Services would have charged that person" (paragraph 6). He also stated an intent to calculate exactly what GIC did charge that person in order to validate the methodology (paragraph 30).

Griglack's 10/17/2022 report documents several data limitations and assumptions made to produce calculated GIC premiums that tie out to the six-month snapshot premiums provided by USAA. In the end, Griglack was unable to rate 0.49% of vehicles (paragraph 33), and calculated snapshot premiums within +/- 1% of the given premium for 90-92% of the remaining vehicles (paragraph 39). Although these figures appear to suggest a high degree of accuracy, the snapshot premiums for some policyholders are off by thousands of dollars. Because Schwartz is using the calculated premiums from Griglack's files without any adjustments, regardless of the size of the error between the calculated and given snapshot premiums, the bias in the rating errors is subsequently biasing the damage estimates.

In Exhibit 3, I have estimated the impact of the snapshot rating errors on the calculated damages. Exhibit 3, Pages 3 and 4 show sample policies with large errors in Griglack's calculated GIC premium vs. the given GIC premium. Page 3 shows the impact on the Good Driver class damage estimates, and Page 4 shows the impact on Discrimination Class damage estimates using Schwartz's Modified Primary Damages method. In these examples, Griglack's calculated GIC snapshot premiums are up to \$8,684 higher than the "given" GIC snapshot premiums calculated by USAA. For these examples, I adjusted the damages using the given GIC premium and the ratio of Griglack's calculated premiums for United Services and GIC. The calculated dollar and percent differences from Schwartz's damages are shown in the last two columns. As shown in Pages 3 and 4, the discrepancies for individual policies can be significant, such that Schwartz's damages are overstated by as much as \$1,641, or close to 70%.

Exhibit 3 also shows a summary of the impact of the rating errors on the estimated damages for the Good Driver Class (Page 1) and Discrimination Class (Page 2). A significant number have larger errors and the errors are biased toward overestimating the damages. For the Good Driver

Class, Schwartz has overstated the damages by about \$262,000 due to the rating errors, and for the Discrimination Class the overstatement is about \$378,000.

Schwartz's damage formulas are fundamentally unsound

In his 4/7/2022 declaration, Schwartz states that a reasonable damage calculation would reflect the difference between the insurance premiums charged to the Plaintiffs compared to what the appropriate premium should have been, consistent with actuarial practices and applicable law (paragraph 16).

Plaintiffs have proposed two damage theories, one that measures the difference between the GIC and United Services premiums at filed rates (Primary Damages) and one that measures the difference between the GIC premium and what the premium purportedly would have been if the United Services base rates were raised to the extent necessary to bring in the same amount of total premium (Alternate Damages).

Schwartz uses the Primary Damages formula to estimate damages for the alleged violations of section 1861.16(b) of the California Insurance Code, which requires auto insurers to offer a statutory "good driver" a policy from the insurer with the lowest rates within a commonly controlled group of companies.

The second allegation is illegal discrimination by military status (the Discrimination Class). Here the assertion is that charging higher rates for GIC compared with United Services discriminates against enlisted personnel based on their military status in violation of California's anti-discrimination laws. In essence, the Plaintiffs object to the higher base rates in GIC, and the Discrimination claim is that USAA may not differentiate base rates based on military status. Therefore Plaintiffs' "appropriate premium" consistent with that theory would be one where the same base rates are used for both United Services and GIC. This means that the Primary Damages and Modified Primary Damages methodologies proposed by Schwartz are inconsistent with the Discrimination claim, as the premiums used to calculate the damages for these methods by definition use base rates for United Services that were already differentiated by pay grade.

Schwartz's Alternative method purports to increase the dollar amount of United Services premium by the dollar amount decrease in premium for GIC, to balance the total premiums (Schwartz Declaration 4/7/2022, paragraphs 21-24). Since the hypothetical United Services premiums are increased, the estimated damages are lower using Schwartz's alternative methodology. But this second methodology is also flawed. It is not equivalent to "charging the same base rates" for each company and it does not balance the total premiums to what USAA would have earned if the same base rates were used for both companies.

To calculate base rates that would be consistent with actuarial practices and applicable California law and regulations, one would have to restate overall rate level indications using historical loss experience for United Services and GIC combined that adhere to actuarial standards and California ratemaking regulations. This restated historical data would inform the selection of new trend and loss development factors, which may be different than the historical trend and loss development factors underlying the prior approved rates for United Services and GIC.

In California, all inputs to the overall PPA rate calculations are derived from the relevant historical data, as well as parameters provided by the CDI. The overall premiums must be within the permissible range of reasonable rates as defined by the CCR. Exhibit 4 compares the rating inputs for GIC and United Services rate filings submitted in 2017 for Collision coverage. Exhibit 4 lists all the critical inputs that go into an overall PPA rate calculation, as well as the resulting outputs, and compares the United Services amounts to the GIC amounts. Both companies in this example are using the same historical time period for loss and exposure data. During this historical period, there were material differences in loss per exposure as well as both historical and prospective trends. These differences result in distinctly different ranges for minimum and maximum indicated premium. The minimum and maximum Collision premiums calculated based on the GIC policyholder pool were approximately 55% higher than those calculated based on the United Services policyholder pool. In fact, the lowest allowable premium for GIC (\$435.39) was almost 30% more than the highest allowable premium for United Services (\$336.37). This gap indicates that based on the data and parameters in these filings, there is no overlap in the range of base premiums between the two companies that would be considered approvable under California regulation.

Given the complexity of the calculations and assumptions necessary to support the development of overall rates and base rates, the differences between current United Services and GIC rates, relativities, loss development factors and trends, and the effect of CDI involvement in the process, I am certain the combined overall rates, developed on combined trend and loss development selections, would not produce the same overall rate level as the sum of the separate premiums, as Schwartz assumes. Thus, Schwartz's "revised" premiums are still likely to be out of compliance with regulatory requirements and do not represent what USAA would have charged had the same base rates been developed to be used for the combined United Services and GIC risk pools.

Furthermore, if one wanted to eliminate all premium differences between United Services and GIC, the class plan factors would also need to be identical. This would entail re-analyzing the class plan factors, selecting the same factors for United Services and GIC, and reviewing/revising the rating factors as needed for CCR compliance on a combined basis. The base rates would also need to be re-calculated using the combined rate level and class plan factors on the combined data. None of this is contemplated in Schwartz's damage formulas.

In addition, Schwartz's Alternative method does not actually "balance" the overall premium since there is no way to go back and charge the adjusted United Services rates to anyone other than GIC members. To actually balance the overall premium, Defendants would have to retroactively charge United Services policyholders the new higher combined rates (which it obviously cannot do).

For Schwartz's damage estimates used for the Good Driver class, no Alternative method is proposed with adjustments to the United Services premiums. Essentially the method assumes that the GIC Good Drivers should have been written into United Services if that lowered their premiums. However, had USAA ignored the Company Placement guidelines filed with the CDI and moved Good Driver policies from GIC into United Services, this would have substantially

altered the risk pools in United Services and GIC. Once this change was made, the experience for the re-shuffled pools would be reflected in the next rate reviews for both companies, similar to the process described above. This would have resulted in a material recalibration of the rate levels and base rates. It is highly unlikely that USAA would have continued to use the base rates that had been developed on the historical United Services/GIC risk pools for the entire class period, which is what Schwartz and Griglack are assuming in their calculations.

Conclusion

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on December 2, 2022, at Orinda, California.

By:



Nancy Watkins

NANCY P. WATKINS

Milliman, Inc.
650 California Street, Suite 2100
San Francisco, California 94108
(415) 394-3733

PROFESSIONAL EXPERIENCE

- 1997 to present MILLIMAN, INC.: Atlanta, GA and San Francisco, CA
Principal and Consulting Actuary — Manages San Francisco property & casualty consulting practice.
- 1991 to 1997 WATKINS CONSULTING CO.: Atlanta, GA
President — Owned and managed independent actuarial consulting firm.
- 1989 to 1991 PRICE WATERHOUSE, LLP: Atlanta, GA
Senior Manager and Consulting Actuary
- 1986 to 1989 JOHN HANCOCK REINSURANCE: Boston, MA
Actuarial Analyst
- 1983 to 1986 AETNA LIFE & CASUALTY: Hartford, CT
Actuarial Student

EDUCATION AND CREDENTIALS

B.S. in Mathematical Sciences, University of North Carolina at Chapel Hill
Fellow, Casualty Actuarial Society
Member, American Academy of Actuaries

AWARDS

American Academy of Actuaries Outstanding Volunteerism Award, November 2018
Casualty Actuarial Society Above and Beyond Achievement Award, October 2006

PROFESSIONAL SERVICE

Leader, Milliman Climate Resilience Initiative
Member, California Office of the State Fire Marshal Risk Modeling Advisory Workgroup and Wildfire Mitigation Advisory Committee
Member, Climate Insurance Linked Resilient Infrastructure Finance Working Group of United Nations Capital Development Fund
Advisory Board Member, The Wharton Risk Center Policy Incubator initiative “Improving the financial recovery from coastal disasters: innovative risk transfer instruments”
Chair, American Academy of Actuaries Committee on Property and Liability Financial Reporting
Member, American Academy of Actuaries Casualty Practice Council
Member, American Academy of Actuaries Financial Reporting Council
Co-Chair, American Academy of Actuaries Best Estimates Working Group
Member, Casualty Actuarial Society Committee on Special Interest Seminars
Member, Casualty Actuarial Society Committee on Reinsurance Research

INVITED PRESENTATIONS

“Sparking Solutions: Wildfire Risk and Insurance”
Resources For the Future, November 2022

“PG&E: Corporation and Climate Risk in the Real World”
Stanford University Graduate School of Business and Sustainability Accelerator, November 2022

“Perfect Partners: Fire Chiefs and Insurers”
Property Insurance Reports National Conference, November 2022

“Milliman Bungalow: Development of Proprietary Flood Program”
Casualty Actuaries in Reinsurance, August 2022

“Diversity and Inclusion in Practice”
CAS Seminar on Reinsurance, June 2022

“State of the Private Flood Market - Industry Perspective”
National Flood Conference, June 2022

” Understanding California Sea Level Rise Studies and Guidance”
Smart Coast California, May 2022

“Economic Consequences of Sea Level Rise”
Smart Coast California, May 2022

“Intersecting Issues of Climate Change, Insurance, Modeling and Risk Measurement”
Sandia BASES, April 2022

“U.S. Private Flood Market”
NAIC Catastrophe Risk (E) Subgroup, February 2022

“State of the Homeowners Fire and Flood Insurance Market”
California Association of REALTORS Public Policy Forum, January 2022

“Calling all actuaries: The Need for Risk Experts to Shape Climate Action”
CAS Annual Meeting, November 2021

“Dialogue with Spencer Glendon on Our Climate Future”
Milliman Climate Resilience Forum, September 2021

“Private Flood Market Development”
NAIC Insurance Summit, September 2021

“A Climate Crisis in Insurance Markets?”
Wharton Risk Center, August 2021

“Current State of the U.S. Private Flood Market”
National Flood Conference, June 2021

“Role of RR 2.0 in Future Loss Reduction”
National Flood Conference, June 2021

“Insurance Implications of Climate Change”
CREFC Sustainability Initiative, June 2021

“The Risk of Rapid Sea-Level Rise and the Financial Risks to U.S. Coastal Communities”
The House Select Committee on the Climate Crisis, May 2021

“A New Strategy for Addressing the Wildfire Epidemic in California”
Stanford Woods Institute for the Environment Webinar, April 2021

“Climate Risk and Market Value: Data Innovations for Real Estate”
ULI Climate Data Webinar, March 2021

“Climate Change: From Emerging Risk to Real Life Danger”
Milliman Climate Resilience Forum, March 2021

“U.S. Insurance Regulatory Climate Leadership”
Milliman Climate Resilience Forum, March 2021

“Unprecedented, Predictable, and Uninsurable: The Risks Posed by Climate Change”
Milliman Climate Resilience Forum, March 2021

“The Case for Change: Regulatory Approval of Catastrophe Models”
California Department of Insurance Virtual Meeting, December 2020

“Climate Data, Disclosure, and Industry Impacts”
ULI Resilience Summit, December 2020

“Private Flood Insurance: Then, Now, What's to Come?”
FAIR Conference, October 2020

“Regulatory Workshop on Private Flood Insurance”
Southeastern Zone Regulators Association, September 2020

“B2C Insurtech Strategy”
NYCA Insurance Symposium, September 2020

“Insurance Innovations: It's Not Your Grandmother's Flood Insurance”
Floodplain Management Association Annual Meeting, September 2020

“Clearing the Way for Regulatory Approval of Catastrophe Models”
NAIC Catastrophe Insurance Working Group Meeting, July 2020

“The Climate-Savvy Investor: Assessing Resilience in U.S. Markets”
ULI Spring Meeting, June 2020

“The State of the Private Flood Market”
National Flood Conference, June 2020

“The Role of Insurance in Climate Resilience”
Council on Foreign Relations, May 2020

“Regulatory Risk: Finding Safe Passage Through Flood's Choppy Waters”
RMS Exceedance, May 2020

“Making Communities Flood Resilient”
UNC Clean Tech Summit, February 2020

“The Economic and National Security Dimensions of Climate Change”
UNC Clean Tech Summit, February 2020

Climate Change and Real Estate Panel
ULI SF Climate Change in Real Estate, February 2020

“National Flood Insurance Program – The Need for Change”
NAIC Winter National Meeting, December 2019

“Clearing the Way for Regulatory Approval of Catastrophe Models”
Property Insurance Report National Conference, November 2019

“Staging Your State for Private Flood”
NAIC SE Regional Insurance Commissioners Meeting, October 2019

“Staging Your State for Private Flood”
NAIC Summer National Meeting, August 2019

“Is California Catastrophe Regulation Leading to a Homeowners Rate Crisis?”
APCIA Western Region General Counsel Conference, July 2019

“NFIP Reauthorization - How to Bridge the Flood Insurance Gap”
PCI National Flood Conference, June 2019

“Underwriting Private Flood Insurance”
RAA Board Meeting, April 2019

“Insurance: Transferring and Assessing Risk”
Hinshaw Sea Level Rise/Climate Change, April 2019

“Global Corporate Responsibility”
Climate Resilience Summit, November 2018

“The Future of Flood Insurance”
Risk Mitigation Leadership Forum, October 2018

“The Rising Private Flood Insurance Market”
Torrent Flood Seminar, July 2018

“Overview of the Private Flood Market”
CAS Underwriting Collaboration Seminar, June 2018

“NFIP Risk Rating and Policy Forms Redesign”
PCI National Flood Conference, June 2018

“What Federal Flood Insurance Reform Means to You”
RMS Exceedance, May 2018

“The Rising Flood Insurance Market”
Florida Insurance Market Summit, March 2018

“Competitive Analysis: Know the Data, Know the Market”
CAS Ratemaking, Product and Modeling Seminar, March 2017

“Private Flood Insurance”
CAS Severe Weather Workshop, March 2017

“Insuring Flood in the United States”
RAA Cat Risk Management Conference, February 2017

“Flood Insurance Pricing”
CAS Severe Weather Workshop, March 2016

“Flood Insurance - Private Market Alternatives”
Florida Insurance Market Summit, March 2016

“Strategies for Homeowners Profitability and Growth”

Casualty Actuaries of the Northwest, September 2015

“Assessing and Integrating Risk into Actuarial Practices”

California Insurance Commissioner / Risky Business / Stanford University Steyer-Taylor Center for Energy Policy and Finance / Sandia National Laboratories / American Academy of Actuaries Climate Risk Forum: Bridging Climate Science and Actuarial Practice, September 2014

“Property Analytics Using Third Party Data”

Guy Carpenter ERM and Capital Modeling Conference, September 2014

“Homeowners Profitability and Growth”

CSC Executive Innovation Series for Florida Residential Property, April 2014

“Best Practices Rating Model”

Property Casualty Insurers Association of America “Caught in the Middle” Roundtable, November 2013

“Caught in the Middle Panel”

Property Casualty Insurers Association of America Annual Meeting, October 2013

“Best Practices in Catastrophe Ratemaking”

Wharton Risk Management and Decision Processes Center National Cat Solutions Meeting, June 2013

“Homeowners Profitability”

CAS Spring Meeting, May 2013

“Beach Plan Deficit: Cost to N. C. Policyholders and Taxpayers”

North Carolina Legislative Research Subcommittee on Property Insurance Ratemaking, March 2012

“Using Predictive Analytics to Profitably Grow your Business”

Duck Creek Insurance Forum, May 2010

“Practical Applications of Predictive Modeling in Homeowners Insurance”

Casualty Actuarial Society Ratemaking and Product Management Seminar, March 2010

“California Private Passenger Auto Ratemaking — A Case Study”

Casualty Actuarial Society Ratemaking and Product Management Seminar, March 2009

North Carolina General Assembly Joint Select Study Committee on the Potential Impact of Major Hurricanes on the North Carolina Insurance Industry, October 2008

“Issues and Opportunities”

Fiserv Insurance Executive Summit, September 2008

“Auto Class Plan Filings”

Association of California Insurance Companies General Counsel Seminar, July 2008

“Reinsurance — Risk Transfer Overview”

Crittenden Medical Insurance Conference, April 2008

“Reinsurance: Accounting, Actuarial and Real World Perspectives”

International Association of Insurance Receivers Insolvency Workshop, January 2008

“Hot Topics in P&C Accounting and Reinsurance”

Fiserv Client Conference, September 2007

“Impact of Auto Rating Factor Regulations”

Association of California Insurance Companies General Counsel Seminar, August 2007

“Reinsurance Risk Transfer Practices”

Crittenden Reinsurance Conference, August 2007

“Finite Risk”

Casualty Actuarial Society Risk Transfer Limited Attendance Seminar, November 2006

“Hot Topics in P&C Accounting, Reporting and Reinsurance”

Fiserv Client Conference, September 2006

“Reinsurance Client Panel: Finite Reinsurance”

Fiserv Client Conference, September 2006

“Finite Reinsurance and Risk Transfer: Activities of the American Academy of Actuaries”

Reinsurance Association of American Current Issues Forum, May 2006

“Accounting Issues Update: Reinsurance Risk Transfer”

National Risk Retention Association Annual Conference, October 2005

“Insurance Risk Transfer — An Issues Update”

Casualty Loss Reserve Seminar, September 2005

“Issues Regarding Statutory Statements of Actuarial Opinion”

Southern California Casualty Actuarial Club Fall Meeting, September 2004

“NAIC/AAA Loss Reserve Symposium for Readers and Writers of Loss Reserve Opinions”,

Casualty Loss Reserve Seminar, September 2003

“Why Establish a Virtual Company?”

Virtual Insurance Operations Conference, June 2001

“Actuaries and the Internet”

Casualty Actuarial Society Annual Meeting, November 2000

“Virtual Insurance Companies”

Virtual Insurance Operations Forum, November 2000

PUBLICATIONS

“Conversations about Risk Rating 2.0.”

Wharton Risk Center, May 2022

“Climate risk and real estate: Emerging practices for market assessment.”

ULI Knowledge Finder, October 2020

“At a crossroads.”

Milliman Insight, September 16, 2020

“Trial by Wildfire: Will Efforts to Fix Home Insurance in California Stand the Test of Time?” -

Milliman Insight, September 2020

“U.S. Private Flood Insurance: The Journey to Build a New Market.”

Carrier Management, Insurance Journal, September 2019

“Climate change is making Americans anxious. Insurers can help.”

Milliman Insight, April 2019

“Four Ways Hurricane Florence Could Ricochet Across the Insurance Industry”

Milliman Insight, September 14, 2018

“What Could Private Flood Insurance Look Like in New Jersey and New York?”

Milliman Insight, July 24, 2018

“Could Private Flood Insurance be Cheaper than the NFIP?”

Milliman Insight, July 10, 2017

“Why Big Data is a Big Deal” - Insurance ERM, July 13, 2013

“Being Virtual Has Its Virtues” - National Underwriter, September 4, 2000

EXPERT WITNESS ASSIGNMENTS

Howard Mills, Superintendent of Insurance of State of New York vs. Everest Reinsurance Company, expert on behalf of defendant, October 2006.

Mercury Casualty Company, expert in support of rate filing #13-716 being considered by the California Department of Insurance for Mercury’s California Homeowners business, June 2013.

Monterey Bay Military Housing, LLC, et al. v. Pinnacle Monterey LLC, et al., expert in support of plaintiffs Monterey Bay Military Housing, LLC, et al., June 2014.

State Farm Fire & Casualty Company, et al. v. Bruce L. Brown, et al., expert in support of defendants State Farm Fire & Casualty Company, et al. February 2017.

Farmers Insurance Exchange & Mid Century Insurance Company v. Roger Harris, Duane Brown, & Brian Lindsey, expert in support of defendants Farmers Insurance Exchange & Mid Century Insurance Company, November 2018.

American Property Casualty Insurance Association, et al., and Petitioner Intervenor National Association of Mutual Insurance Companies, v. Office of the Insurance Commissioner of the State of Washington and Insurance Commissioner Mike Kreidler, expert in support of petitioner intervenor NAMIC, June 2021.

Taqueria El Primo LLC, et al. v. Farmers Group, Inc., et al., expert in support of defendants Farmers Group, Inc., et al., August 2021.

Farmers Insurance Exchange v. Daniel De Sloover, expert in support of plaintiff & cross-defendant Farmers Insurance Exchange, March 2022.

Eileen-Gayle Coleman and Robert Castro, on behalf of themselves and all others similarly situated v. United Services Automobile Association and USAA General Indemnity Company, expert in support of defendants United Services Automobile Association and USAA General Indemnity Company, May 2022.

Jessica Day, individually and on behalf of all others similarly situated v. GEICO Casualty Company, GEICO Indemnity Company, and GEICO General Insurance Company (“GEICO”), expert in support of defendants GEICO, August 2022.

EXPERT TESTIMONY AT RATE HEARINGS

Table 1 Expert Testimony at Rate Hearings by Nancy Watkins				
Hearing Date	Company	Filing #	Line of Business	State
11/9/2006	St. Johns	FCP 06-11223	HO	Florida
11/16/2006	United P&C	FCP 06-13037	HO	Florida
10/29/2009	Olympus Ins Co	FCP 09-17588	HO	Florida
2/10/2010	First Home	FCP 09-23287	HO	Florida
3/2/2010	ACA Home	FCP 10-00311	HO	Florida
10/21/2010	First Community	FCP 10-14149	DF	Florida
12/7/2010	First Home	FCP 10-17219	HO	Florida
3/10/2011	Olympus	FCP 11-00692	HO	Florida
3/22/2011	First Community	FCP 11-00972	HO	Florida
5/12/2011	Fidelity National	FCP 11-04301	HO	Florida
9/8/2011	Fidelity Fire & Casualty/First Protective	FCP 11-11215	DF	Florida
5/17/2012	Sunshine State	FCP 12-0376 FCP 12-04939	HO DF	Florida
9/20/2012	Citizens Property Insurance Corporation	FCP 12-13991 FCP 12-13992	HO (Coastal) HO	Florida
5/30/2013	Fidelity National	FCP-13-07023	HO	Florida
1/7/2016	State Farm General	CDI 14-8381	HO	California

ARBITRATIONS

Sunshine State Insurance Company (SSIC) and Florida State Board of Administration (SBA), served on an arbitration panel of three actuaries appointed to conduct the resolution of a dispute between the Florida Hurricane Catastrophe Fund and SSIC, November 2010.

Kramer-Wilson Company, Inc. and National General Holding Corp. arbitration. Party arbitrator for Kramer-Wilson Company, Inc., May 2019

EXHIBIT C1

**United Services Automobile Association
USAA General Indemnity Company
Impact of Mid-Term Changes**

Plaintiff Castro (124102557) Example

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Snapshot Date (Note 1)	Griglack Calculated GIC Premium (Note 2)	Griglack Calculated United Services Premium (Note 2)	Actual Earned Premium (Note 3)	Ratio of United Services to GIC (Note 4)	Damages		Damage Error \$ (Note 7)	Damage Error % (Note 8)
					Schwartz (Note 5)	On Actual (Note 6)		
4/1/2018	\$1,255.88	\$1,070.60	\$1,192.76	85.2%	\$185.28	\$175.97	\$9.31	5%
10/1/2018	\$1,199.71	\$1,025.15	\$1,232.06	85.4%	\$174.56	\$179.27	(\$4.71)	-3%
4/1/2019	\$1,212.17	\$1,017.22	\$1,210.72	83.9%	\$194.95	\$194.72	\$0.23	0%
10/1/2019	\$1,178.95	\$1,005.98	\$1,371.97	85.3%	\$172.97	\$201.29	(\$28.32)	-14%
4/1/2020	\$1,627.06	\$1,212.12	\$1,594.85	74.5%	\$414.94	\$406.73	\$8.21	2%
10/1/2020	\$1,497.01	\$1,158.49	\$1,410.93	77.4%	\$338.52	\$319.06	\$19.46	6%
4/1/2021	\$1,609.41	\$1,230.92	\$1,774.16	76.5%	\$378.49	\$417.24	(\$38.75)	-9%
10/1/2021	\$1,738.52	\$1,325.57	(Note 9)	76.2%	\$412.95	N/A	N/A	N/A
Total:					\$1,859.71	\$1,894.26	(\$34.55)	-2%

Plaintiff Coleman (96203567) Example

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Snapshot Date (Note 1)	Griglack Calculated GIC Premium (Note 2)	Griglack Calculated United Services Premium (Note 2)	Actual Earned Premium (Note 3)	Ratio of United Services to GIC (Note 4)	Damages		Damage Error \$ (Note 7)	Damage Error % (Note 8)
					Schwartz (Note 5)	On Actual (Note 6)		
4/1/2018	\$1,467.33	\$1,113.42	\$996.47	75.9%	\$353.91	\$240.34	\$113.57	47%
10/1/2018	\$1,448.92	\$1,098.52	\$1,451.50	75.8%	\$350.40	\$351.02	(\$0.62)	0%
4/1/2019	\$1,436.99	\$1,086.33	\$1,441.59	75.6%	\$350.66	\$351.78	(\$1.12)	0%
10/1/2019	\$1,575.96	\$1,212.21	\$1,577.56	76.9%	\$363.75	\$364.12	(\$0.37)	0%
4/1/2020	\$1,568.99	\$1,207.31	\$1,544.85	76.9%	\$361.68	\$356.11	\$5.57	2%
10/1/2020	\$1,427.02	\$1,119.42	\$1,517.64	78.4%	\$307.60	\$327.13	(\$19.53)	-6%
4/1/2021	\$1,674.57	\$1,306.32	\$1,600.34	78.0%	\$368.25	\$351.93	\$16.32	5%
Total:					\$2,456.25	\$2,342.45	\$113.80	5%

Notes:

- Snapshot dates reflect data provided for 4/1 and 10/1 and reflect evaluation dates of 3/31 and 9/30 respectively.
- GIC premium and United Services premium as calculated by Jonathan Griglack. Data received on October 18, 2022.
File names: App C-5 - Results 3-31-2018 Final.xlsx
App C-6 - Results 9-30-2018 Final.xlsx
App C-7 - Results 3-31-2019 Final.xlsx
App C-8 - Results 9-30-2019 Final.xlsx
App C-9 - Results 3-31-2020 Final.xlsx
App C-10 - Results 9-30-2020 Final.xlsx
App C-11 - Results 3-31-2021 Final.xlsx
App C-12 - Results 9-30-2021 Final.xlsx
Source fields from Griglack files:
Column (2) Calculated GIC Premium
Column (3) USAA Premium
- From Pages 2 and 3.
- (5) = (3) / (2)
- (6) = (2) - (3)
- (7) = (4) x [1 - (5)]
- (8) = (6) - (7); Positive amounts are overestimated damages from snapshot vs actual. Negative amounts are underestimated.
- (9) = (8) / (7)
- Declaration pages for the full policy period were not provided, so this value was omitted. Partial earned premiums for this period can be found on Page 2. Total row does not include the 10/1/2021 snapshot.

**United Services Automobile Association
USAA General Indemnity Company
Impact of Mid-Term Changes**

Plaintiff Castro Example

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Start Date	End Date	Days in Full Period	Description of Change	Six-month Policy Premium	% Policy Period	Partial Actual Earned Premium	6-month Actual Earned Premium
4/1/2018	6/23/2018	183	First snapshot date	\$1,278.90	45.4%	\$580.05	
6/23/2018	6/23/2018	183	Change in operator data	\$1,278.90	0.0%	\$0.00	
6/23/2018	6/23/2018	183	Comprehensive loss changed	\$1,237.37	0.0%	\$0.00	
6/23/2018	8/18/2018	183	Veh 04 info change	\$1,058.41	30.6%	\$323.89	
8/18/2018	9/5/2018	183	Policy adjustment	\$1,139.46	9.8%	\$112.08	
9/5/2018	9/5/2018	183	Renewal	\$1,155.03	0.0%	\$0.00	
9/5/2018	10/1/2018	183	Policy adjustment	\$1,244.05	14.2%	\$176.75	\$1,192.76
10/1/2018	1/7/2019	182	New snapshot date	\$1,244.05	53.8%	\$669.87	
1/7/2019	2/9/2019	182	Policy adjustment	\$1,155.03	18.1%	\$209.43	
2/9/2019	3/5/2019	182	Policy adjustment	\$1,276.51	13.2%	\$168.33	
3/5/2019	3/5/2019	182	Renewal	\$1,155.22	0.0%	\$0.00	
3/5/2019	3/5/2019	182	Policy Adjustment	\$1,212.02	0.0%	\$0.00	
3/5/2019	3/18/2019	182	Policy Adjustment	\$1,276.76	7.1%	\$91.20	
3/18/2019	4/1/2019	182	Policy Adjustment	\$1,212.02	7.7%	\$93.23	\$1,232.06
4/1/2019	7/11/2019	183	New snapshot date	\$1,212.02	55.2%	\$668.93	
7/11/2019	9/5/2019	183	Policy Adjustment	\$1,212.02	30.6%	\$370.89	
9/5/2019	10/1/2019	183	Renewal	\$1,202.89	14.2%	\$170.90	\$1,210.72
10/1/2019	1/29/2020	183	New snapshot date	\$1,202.89	65.6%	\$788.78	
1/29/2020	2/27/2020	183	Med Pay coverage added, passive restraint disc allowed	\$1,744.40	15.8%	\$276.43	
2/27/2020	3/5/2020	183	Policy Adjustment	\$1,744.40	3.8%	\$66.73	
3/5/2020	3/5/2020	183	Renewal	\$1,130.00	0.0%	\$0.00	
3/5/2020	3/5/2020	183	Change vehicle location, annual mileage	\$1,595.15	0.0%	\$0.00	
3/5/2020	4/1/2020	183	Policy Adjustment	\$1,626.87	14.8%	\$240.03	\$1,371.97
4/1/2020	6/25/2020	183	New snapshot date	\$1,626.87	46.4%	\$755.65	
6/25/2020	8/27/2020	183	Policy Adjustment	\$1,626.87	34.4%	\$560.07	
8/27/2020	9/5/2020	183	MP, COMP, COLL, RR limits changed	\$1,351.60	4.9%	\$66.47	
9/5/2020	9/5/2020	183	Renewal	\$1,787.76	0.0%	\$0.00	
9/5/2020	10/1/2020	183	Med, Comp, RR, COLL limits changed	\$1,496.78	14.2%	\$212.66	\$1,594.85
10/1/2020	2/17/2021	182	New snapshot date	\$1,496.78	76.4%	\$1,143.15	
2/17/2021	3/5/2021	182	Change in operator status, delete Veh 05	\$720.46	8.8%	\$63.34	
3/5/2021	3/5/2021	182	Renewal	\$1,496.78	0.0%	\$0.00	
3/5/2021	3/6/2021	182	Change in operator status, delete Veh 05	\$720.46	0.5%	\$3.96	
3/6/2021	3/12/2021	182	Change in operator data	\$720.46	3.3%	\$23.75	
3/12/2021	4/1/2021	182	Add Veh 06, Change in operator status, vehicle features change	\$1,608.34	11.0%	\$176.74	\$1,410.93
4/1/2021	4/29/2021	183	New snapshot date	\$1,608.34	15.3%	\$246.08	
4/29/2021	7/11/2021	183	Change in operator status, add/delete vehicle	\$1,822.99	39.9%	\$727.20	
7/11/2021	8/28/2021	183	Policy Adjustment	\$1,822.99	26.2%	\$478.16	
8/28/2021	9/5/2021	183	Increase limits	\$1,872.17	4.4%	\$81.84	
9/5/2021	10/1/2021	183	Renewal	\$1,695.35	14.2%	\$240.87	\$1,774.16
10/1/2021	3/5/2022	182	(Note 5)	\$1,695.35	85.2%	\$1,443.84	\$1,443.84
Total						\$11,231.30	

Notes:

- Data in Columns (1) through (5) from the following documents supplied by USAA:
Castro 47186412_1_UW Files.pdf
Castro 47859054_1_UW Files.pdf
- (6) = [(2) - (1)] / (3).
- (7) = (5) x (6).
- (8) = six month sum of (7)
- 3/5/2022 is the final ending effective date we have received in the declaration pages referenced in Note 1.

**United Services Automobile Association
USAA General Indemnity Company
Impact of Mid-Term Changes
Plaintiff Coleman Example**

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Start Date	End Date	Days in Full Period	Description of Change	Six-month Policy Premium	% Policy Period	Partial Actual Earned Premium	6-month Actual Earned Premium
4/1/2018	4/16/2018	183	First snapshot date	\$1,466.50	8.2%	\$120.20	
4/16/2018	9/27/2018	183	Change in operator status, deletion of Veh 01	\$942.37	89.6%	\$844.53	
9/27/2018	10/11/2018	183	Renewal	\$1,451.87	2.2%	\$31.73	\$996.47
10/1/2018	3/27/2019	182	New snapshot date	\$1,451.87	97.3%	\$1,411.98	
3/27/2019	4/1/2019	182	Renewal	\$1,438.55	2.7%	\$39.52	\$1,451.50
4/1/2019	9/27/2019	183	New snapshot date	\$1,438.55	97.8%	\$1,407.11	
9/27/2019	10/11/2019	183	Renewal	\$1,577.80	2.2%	\$34.49	\$1,441.59
10/1/2019	3/27/2020	183	New snapshot date	\$1,577.80	97.3%	\$1,534.69	
3/27/2020	4/1/2020	183	Renewal	\$1,569.13	2.7%	\$42.87	\$1,577.56
4/1/2020	5/8/2020	183	New snapshot date	\$1,569.13	20.2%	\$317.26	
5/8/2020	5/8/2020	183	Change in operator data	\$1,569.13	0.0%	\$0.00	
5/8/2020	9/27/2020	183	Policy Adjustment	\$1,541.84	77.6%	\$1,196.40	
9/27/2020	10/11/2020	183	Renewal	\$1,427.03	2.2%	\$31.19	\$1,544.85
10/1/2020	2/6/2021	182	New snapshot date	\$1,427.03	70.3%	\$1,003.63	
2/6/2021	2/6/2021	182	Policy Adjustment	\$1,737.06	0.0%	\$0.00	
2/6/2021	3/28/2021	182	Change in vehicle location	\$1,737.06	27.5%	\$477.21	
3/28/2021	3/28/2021	182	Policy Adjustment	\$1,674.61	0.0%	\$0.00	
3/28/2021	4/1/2021	182	BI, PD, UMBI, RR Limits changed	\$1,674.61	2.2%	\$36.80	\$1,517.64
4/1/2021	4/9/2021	183	New snapshot date	\$1,674.61	4.4%	\$73.21	
4/9/2021	4/9/2021	183	Policy Adjustment	\$1,674.61	0.0%	\$0.00	
4/9/2021	4/19/2021	183	Removed RR and Towing/Labor	\$1,614.93	5.5%	\$88.25	
4/19/2021	6/8/2021	183	Change info for Veh 03	\$1,614.93	27.3%	\$441.24	
6/8/2021	9/27/2021	183	Added RR and Towing/Labor (Note 5)	\$1,644.77	60.7%	\$997.65	\$1,600.34
Total						\$10,129.96	

Notes:

1. Data in Columns (1) through (5) from the following document supplied by USAA:
47185459_1_UW Files.pdf
2. (6) = [(2) - (1)] / (3).
3. (7) = (5) x (6).
4. (8) = six month sum of (7)
5. 9/27/2021 is the final expiration date we have received in the declaration pages referenced in Note 1.

United Services Automobile Association
USAA General Indemnity Company
Impact of Mid-Term Changes

Comparison of Calculated and Given GIC Premiums

<u>Plaintiff Castro (124102557) Example</u>					<u>Plaintiff Coleman (96203567) Example</u>			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Snapshot Date (Note 1)	Griglack Calculated GIC Premium (Note 2)	USAA Given GIC Premium (Note 2)	Snapshot Error \$ (Note 3)	Snapshot Error % (Note 4)	Griglack Calculated GIC Premium (Note 2)	USAA Given GIC Premium (Note 2)	Snapshot Error \$ (Note 3)	Snapshot Error % (Note 4)
4/1/2018	\$1,255.88	\$1,259.45	(\$3.57)	-0.3%	\$1,467.33	\$1,466.50	\$0.83	0.1%
10/1/2018	\$1,199.71	\$1,231.02	(\$31.31)	-2.5%	\$1,448.92	\$1,451.87	(\$2.95)	-0.2%
4/1/2019	\$1,212.17	\$1,212.03	\$0.14	0.0%	\$1,436.99	\$1,438.55	(\$1.56)	-0.1%
10/1/2019	\$1,178.95	\$1,202.89	(\$23.94)	-2.0%	\$1,575.96	\$1,577.80	(\$1.84)	-0.1%
4/1/2020	\$1,627.06	\$1,626.87	\$0.19	0.0%	\$1,568.99	\$1,569.13	(\$0.14)	0.0%
10/1/2020	\$1,497.01	\$1,496.78	\$0.23	0.0%	\$1,427.02	\$1,427.03	(\$0.01)	0.0%
4/1/2021	\$1,609.41	\$1,608.34	\$1.07	0.1%	\$1,674.57	\$1,674.61	(\$0.04)	0.0%
10/1/2021	\$1,738.52	\$1,738.88	(\$0.36)	0.0%				

Notes:

- Snapshot dates reflect data provided for 4/1 and 10/1 and reflect evaluation dates of 3/31 and 9/30 respectively.
- Calculated and Given GIC premiums from Jonathan Griglack. Data received on October 18, 2022.

File names:

Source fields from Griglack files:
 Columns (2) and (6) Calculated GIC Premium
 Columns (3) and (7) Given GIC Premium

App C-5 - Results 3-31-2018 Final.xlsx
 App C-6 - Results 9-30-2018 Final.xlsx
 App C-7 - Results 3-31-2019 Final.xlsx
 App C-8 - Results 9-30-2019 Final.xlsx
 App C-9 - Results 3-31-2020 Final.xlsx
 App C-10 - Results 9-30-2020 Final.xlsx
 App C-11 - Results 3-31-2021 Final.xlsx
 App C-12 - Results 9-30-2021 Final.xlsx

- (4) = (2) - (3)
(8) = (6) - (7)
- (5) = (4) / (3)
(9) = (8) / (7)

EXHIBIT C2

Exhibit 2

United Services Automobile Association
 USAA General Indemnity Company
 Vehicle Assignment Investigation

Examples Supporting the Need to Consider Vehicle Assignment Impact

Example 1 Rating Variable	Operator Inputs		GIC		United Services	
	Operator 1	Operator 2	Operator 1	Operator 2	Operator 1	Operator 2
Conviction Points	3 Points	1 Points	1.434	1.150	1.437	1.100
Number of Accidents	0 Accidents	1 Accident	1.000	1.300	1.000	1.250
Operator Base Premium			1.434	1.495	1.437	1.375
Operator Rank			2	1	1	2

Example 2 Rating Variable	Operator Inputs		GIC		United Services	
	Operator 1	Operator 2	Operator 1	Operator 2	Operator 1	Operator 2
Conviction Points	8 Points	1 Points	1.801	1.150	1.805	1.100
Number of Accidents	0 Accidents	2 Accident	1.000	1.600	1.000	1.600
Operator Base Premium			1.801	1.840	1.805	1.760
Operator Rank			2	1	1	2

Notes

- Factors for Conviction Points and Number of Accidents match Excel workbook "SGRisk Limited 10-2019 Comparison (Rates from 19-14).xlsm". GIC factors from SERFF filing # USAA-130660523, effective 12/28/2017. United Services factors from SERFF filing #USAA-130660487, effective date 12/28/2017.
- The examples shown above illustrate hypothetical scenarios of policies with two operators. All else equal, the policies with these operators and characteristics could see their vehicle assignments change if moved from GIC to United Services.

EXHIBIT C3

**United Services Automobile Association
USAA General Indemnity Company
Impact of Rating Errors**

Good Driver Class

(1)	(2)	(3)	(4)	(5)	(6)
Bias Dollar Bins	Policy Count	Schwartz Primary Damages (Note 2)	Adjusted Damages (Note 3)	Total Bias Dollars (Note 4)	Average Bias Dollars (Note 5)
(15, Inf]	7,928	\$11,586,116	\$11,124,192	\$461,924	\$58.26
(5,15]	4,239	\$4,052,817	\$4,014,398	\$38,419	\$9.06
(0,5]	66,480	\$40,759,252	\$40,728,063	\$31,189	\$0.47
(-5,0]	111,970	\$81,036,779	\$81,131,969	(\$95,190)	(\$0.85)
(-15,-5]	6,888	\$8,115,918	\$8,174,047	(\$58,128)	(\$8.44)
(-Inf,-15]	3,562	\$4,850,201	\$4,966,555	(\$116,354)	(\$32.67)
Total:	197,180	\$150,401,083	\$150,139,223	\$261,860	\$1.33

Notes:

1. GIC premium as calculated by Jonathan Griglack. Data received on October 18, 2022.

Policy filters used:

- Policies where no records have Marital Status as "Widow Not in Class" nor "Non-Class Widow"
- United Services Premium records with NA values are excluded.
- Only policies with a positive Collision premium are included.
- Only policies with at least one Good Driver.

Griglack Rated Data Source:

- App C-5 - Results 3-31-2018 Final.xlsx
- App C-6 - Results 9-30-2018 Final.xlsx
- App C-7 - Results 3-31-2019 Final.xlsx
- App C-8 - Results 9-30-2019 Final.xlsx
- App C-9 - Results 3-31-2020 Final.xlsx
- App C-10 - Results 9-30-2020 Final.xlsx
- App C-11 - Results 3-31-2021 Final.xlsx
- App C-12 - Results 9-30-2021 Final.xlsx

2. Schwartz primary damages uses premium values within a snapshot when applying the formula below:

MAX(0, Griglack Calculated GIC Premium - Griglack Calculated United Services Premium)
Formula from Paragraph 6 of Schwartz report "2022-10-17 AIS Merits Report Coleman v USAA.pdf"

3. Adjusted Damages uses premium values within a snapshot when applying the formula below:

MAX(0, USAA Given GIC Premium * (1 - Griglack Calculated United Services Premium/Griglack Calculated GIC Premium))

4. (5) = (3) - (4)

5. (6) = (5) / (2)

**United Services Automobile Association
USAA General Indemnity Company
Impact of Rating Errors**

Discrimination Class (P)

(1)	(2)	(3)	(4)	(5)	(6)
Bias Dollar Bins	Policy Count	Schwartz Modified Primary Damages (Note 2)	Adjusted Damages (Note 3)	Total Bias Dollars (Note 4)	Average Bias Dollars (Note 5)
(15, Inf]	9,749	\$14,184,767	\$13,575,188	\$609,579	\$62.53
(5, 15]	4,459	\$4,456,250	\$4,415,590	\$40,660	\$9.12
(0, 5]	69,195	\$46,302,187	\$46,268,021	\$34,166	\$0.49
(-5, 0]	117,342	\$89,388,101	\$89,489,488	(\$101,387)	(\$0.86)
(-15, -5]	7,623	\$9,727,553	\$9,791,712	(\$64,160)	(\$8.42)
(-Inf, -15]	4,167	\$6,086,170	\$6,227,349	(\$141,179)	(\$33.88)
Total:	212,535	\$170,145,027	\$169,767,348	\$377,679	\$1.78

Notes:

1. GIC premium as calculated by Jonathan Griglack. Data received on October 18, 2022.

Policy filters used:

Policies where no records have Marital Status as "Widow Not in Class" nor "Non-Class Widow"
United Services Premium records with NA values are excluded.
Only policies with a positive Collision premium are included.

Griglack Rated Data Source:

- App C-5 - Results 3-31-2018 Final.xlsx
- App C-6 - Results 9-30-2018 Final.xlsx
- App C-7 - Results 3-31-2019 Final.xlsx
- App C-8 - Results 9-30-2019 Final.xlsx
- App C-9 - Results 3-31-2020 Final.xlsx
- App C-10 - Results 9-30-2020 Final.xlsx
- App C-11 - Results 3-31-2021 Final.xlsx
- App C-12 - Results 9-30-2021 Final.xlsx

2. Schwartz modified primary damages uses total premium values across snapshots before applying the formula below:

MAX(0, Griglack Calculated GIC Premium - Griglack Calculated United Services Premium)

Formula from Paragraph 8 of Schwartz report "2022-10-17 AIS Merits Report Coleman v USAA.pdf"

3. Adjusted Damages uses total premium values across snapshots before applying the formula below:

MAX(0, USAA Given GIC Premium * (1 - Griglack Calculated United Services Premium/Griglack Calculated GIC Premium))

4. (5) = (3) - (4)

5. (6) = (5) / (2)

EXHIBIT C4

United Services Automobile Association
USAA General Indemnity Company
Impact of Rating Errors

Good Driver Class - Example of Bias Calculation

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Policyholder ID	Snapshot Date	Griglack Calculated United Services Premium (Note 1)	Griglack Calculated GIC Premium (Note 1)	USAA Given Premium (Note 1)	Difference Griglack vs USAA GIC Premium (Note 2)	Schwartz Modified Primary Damages (Note 3)	Ratio of United Services to Calculated GIC (Note 4)	Adjusted Damages Calculation (Note 5)	Damage Bias Amount (Note 6)	Damage Bias Percent (Note 7)
312003965	3/31/2019	\$3,438.43	\$4,648.38	\$1,496.00	\$3,152.38	\$1,209.95	74.0%	\$389.40	\$820.55	68%
	9/30/2019	\$3,438.43	\$4,648.38	\$1,496.00	\$3,152.38	\$1,209.95	74.0%	\$389.40	\$820.55	68%
	Subtotal:	\$6,876.86	\$9,296.76	\$2,992.00	\$6,304.76	\$2,419.90		\$778.80	\$1,641.10	68%
696604585	3/31/2020	\$3,653.02	\$4,799.43	\$1,535.95	\$3,263.48	\$1,145.41	76.1%	\$365.88	\$779.53	68%
	9/30/2020	\$3,653.02	\$4,799.43	\$1,535.95	\$3,263.48	\$1,145.41	76.1%	\$365.88	\$779.53	68%
	3/31/2021	\$1,108.78	\$1,438.73	\$1,439.90	(\$1.17)	\$329.95	77.1%	\$330.22	(\$0.27)	0%
	9/30/2021	\$1,819.92	\$2,309.35	\$2,272.90	\$36.45	\$517.43	77.6%	\$509.26	\$8.17	2%
	Subtotal:	\$10,206.74	\$13,346.94	\$6,764.70	\$6,582.24	\$3,140.20		\$1,573.25	\$1,566.85	50%
719104120	3/31/2018	\$4,665.90	\$5,779.72	\$1,837.37	\$3,942.35	\$1,113.82	80.7%	\$354.08	\$759.74	68%
	9/30/2018	\$4,665.90	\$5,779.72	\$1,837.37	\$3,942.35	\$1,113.82	80.7%	\$354.08	\$759.74	68%
	3/31/2019	\$1,421.23	\$1,828.41	\$1,831.71	(\$2.30)	\$408.18	77.7%	\$408.69	(\$0.51)	0%
	9/30/2019	\$1,421.23	\$1,828.41	\$1,831.71	(\$2.30)	\$408.18	77.7%	\$408.69	(\$0.51)	0%
	7/19/2020	\$1,393.09	\$1,818.00	\$1,821.25	(\$3.25)	\$424.91	76.6%	\$425.67	(\$0.76)	0%
	3/31/2021	\$1,183.51	\$1,502.19	\$1,503.26	(\$1.07)	\$318.68	78.8%	\$318.91	(\$0.23)	0%
	Subtotal:	\$14,750.86	\$18,538.45	\$10,662.67	\$7,875.78	\$3,787.59		\$2,270.13	\$1,517.46	40%
219704004	3/31/2019	\$2,753.49	\$3,569.69	\$1,176.41	\$2,393.28	\$816.20	77.1%	\$268.98	\$547.22	67%
	9/30/2019	\$2,753.49	\$3,569.69	\$1,176.41	\$2,393.28	\$816.20	77.1%	\$268.98	\$547.22	67%
	3/31/2020	\$909.64	\$1,169.75	\$1,170.17	(\$0.42)	\$263.11	77.8%	\$263.20	(\$0.09)	0%
	9/30/2020	\$673.11	\$1,106.10	\$1,106.46	(\$0.36)	\$234.99	76.8%	\$235.07	(\$0.08)	0%
	2/19/2021	\$699.52	\$859.13	\$859.51	(\$0.28)	\$189.61	77.9%	\$189.67	(\$0.06)	0%
	9/30/2021	\$562.20	\$718.57	\$718.57	(\$0.22)	\$156.15	78.3%	\$156.20	(\$0.05)	0%
	Subtotal:	\$8,521.45	\$10,994.71	\$6,209.45	\$4,785.26	\$2,473.26		\$1,379.11	\$1,094.15	44%
26204420	3/31/2019	\$2,596.40	\$3,478.39	\$1,616.17	\$1,862.22	\$881.99	74.6%	\$409.80	\$472.19	54%
	9/30/2019	\$2,596.40	\$3,478.39	\$1,616.17	\$1,862.22	\$881.99	74.6%	\$409.80	\$472.19	54%
	3/31/2020	\$1,454.18	\$1,931.12	\$1,933.21	(\$2.09)	\$476.94	75.3%	\$477.46	(\$0.52)	0%
	9/30/2020	\$1,373.81	\$1,827.26	\$1,829.18	(\$1.92)	\$453.45	75.2%	\$453.93	(\$0.48)	0%
	3/31/2021	\$1,338.22	\$1,774.45	\$1,776.34	(\$1.89)	\$436.23	75.4%	\$436.69	(\$0.46)	0%
	Subtotal:	\$10,732.82	\$14,316.87	\$10,600.25	\$3,716.62	\$3,684.05		\$2,641.60	\$942.45	26%

Notes:
 1. Premium by snapshot as calculated by Jonathan Griglack. Data received on October 18, 2022.
 File names:
 App C-5 - Results 3-31-2018 Final.xlsx
 App C-6 - Results 9-30-2018 Final.xlsx
 App C-7 - Results 3-31-2019 Final.xlsx
 App C-8 - Results 9-30-2019 Final.xlsx
 App C-9 - Results 3-31-2020 Final.xlsx
 App C-10 - Results 9-30-2020 Final.xlsx
 App C-11 - Results 3-31-2021 Final.xlsx
 App C-12 - Results 9-30-2021 Final.xlsx
 2. (6) = (4) - (5)
 3. (7) = MAX(0, (4) - (3)). Formula from Paragraph 6 of Schwartz report '2022-10-17 AIS Merits Report Coleman v USAA.pdf'
 4. (8) = (3) / (4)
 5. (9) = (5) x [(1) - (8)]
 6. (10) = (7) - (9). Positive bias reflects overstated damages as determined by Schwartz's Modified Primary Methodology.
 7. (11) = 1 - (9) / (7). Positive bias reflects overstated damages as determined by Schwartz's Modified Primary Methodology.

United Services Automobile Association
USAA General Indemnity Company
Impact of Rating Errors

Discrimination Class (P) - Example of Bias Calculation

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Policyholder ID	Griglack Calculated United Services Premium (Note 1)	Griglack Calculated GIC Premium (Note 1)	USAA Given Premium (Note 1)	Difference Griglack vs USAA GIC Premium (Note 2)	Schwartz Modified Primary Damages (Note 3)	Ratio of United Services to Calculated GIC (Note 4)	Adjusted Damages Calculation (Note 5)	Damage Bias Amount (Note 6)	Damage Bias Percent (Note 7)
312003965	\$6,876.86	\$9,296.76	\$2,992.00	\$6,304.76	\$2,419.90	74.0%	\$778.80	\$1,641.10	68%
719104120	\$14,750.86	\$18,538.45	\$10,662.67	\$7,875.78	\$3,787.59	79.6%	\$2,178.49	\$1,609.10	42%
39802521	\$10,190.65	\$12,467.80	\$3,783.71	\$8,684.09	\$2,277.15	81.7%	\$691.07	\$1,586.08	70%
696604585	\$10,206.74	\$13,346.94	\$6,784.70	\$6,562.24	\$3,140.20	76.5%	\$1,596.27	\$1,543.93	49%
926404291	\$17,038.13	\$20,225.63	\$13,335.13	\$6,890.50	\$3,187.50	84.2%	\$2,101.58	\$1,085.92	34%
219704004	\$8,521.45	\$10,994.71	\$6,209.45	\$4,785.26	\$2,473.26	77.5%	\$1,396.82	\$1,076.44	44%
26204420	\$10,732.82	\$14,316.87	\$10,600.25	\$3,716.62	\$3,584.05	75.0%	\$2,653.64	\$930.41	26%
47803988	\$7,919.41	\$9,951.15	\$5,858.48	\$4,092.67	\$2,031.74	79.6%	\$1,196.13	\$835.61	41%
884903621	\$6,520.27	\$7,965.95	\$4,397.50	\$3,568.45	\$1,445.68	81.9%	\$798.07	\$647.61	45%
306703118	\$22,288.35	\$27,168.98	\$24,145.97	\$3,023.01	\$4,880.63	82.0%	\$4,337.58	\$543.05	11%

Notes:

1. Sum of premiums for all policy periods combined as calculated by Jonathan Griglack. Data received on October 18, 2022.

File names:

- App C-5 - Results 3-31-2018 Final.xlsx
- App C-6 - Results 9-30-2018 Final.xlsx
- App C-7 - Results 3-31-2019 Final.xlsx
- App C-8 - Results 9-30-2019 Final.xlsx
- App C-9 - Results 3-31-2020 Final.xlsx
- App C-10 - Results 9-30-2020 Final.xlsx
- App C-11 - Results 3-31-2021 Final.xlsx
- App C-12 - Results 9-30-2021 Final.xlsx

Source fields from Griglack files:

- Column (2) Calculated USAA Premium
- Column (3) Calculated GIC Premium
- Column (4) Given GIC Premium

2. (5) = (3) - (4)
3. (6) = MAX(0, (3) - (2)). Formula from Paragraph 8 of Schwartz report '2022-10-17 AIS Merits Report Coleman v USAA.pdf'

4. (7) = (2) / (3)

5. (8) = (4) x (1) - (7)

6. (9) = (6) - (8). Positive bias reflects overstated damages as determined by Schwartz's Modified Primary Methodology.

7. (10) = 1 - (8) / (6). Positive bias reflects overstated damages as determined by Schwartz's Modified Primary Methodology.

Exhibit 4

United Services Automobile Association
 USAA General Indemnity Company
 Comparison of GIC and United Services Overall Rate Level Calculation

Line Description	Collision			
	(1)	(2)	(3)	(4)
	GIC (Note 1)	United Services (Note 1)	Difference (United Services vs GIC)	Calculation
(1) California Direct Written Premium	63,375,311	134,354,581	112.0%	(2)/(1) - 1
(2) California Direct Earned Premium	60,633,004	132,770,993	119.0%	(2)/(1) - 1
(3) Miscellaneous Fees and Flat Charges not included in Line (2)	0	0	0	(2) - (1)
(4) Historic Losses (Note 2)	48,835,483	84,973,477	74.0%	(2)/(1) - 1
(5) Historic Defense and Cost Containment Expense (DCCE)	0	0	0	(2) - (1)
(6) Earned Exposure Units	134,508	383,386	185.0%	(2)/(1) - 1
(7) Loss Development Factor	0.960	0.936	-2.5%	(2)/(1) - 1
(8) DCCE Development Factor	0.960	0.936	-2.5%	(2)/(1) - 1
(9) Historical Loss Trend Factor	1.094	1.180	7.9%	(2)/(1) - 1
(10) Historical DCCE Trend Factor	1.094	1.180	7.9%	(2)/(1) - 1
(11) Historical Premium Trend Factor	1.044	1.112	6.5%	(2)/(1) - 1
(12) Premium Adjustment Factor	1.000	1.000	0.0%	(2)/(1) - 1
(13) Catastrophe Adjustment Factor	1.000	1.000	0.0%	(2)/(1) - 1
(14) Loss & DCC per Exposure	381.35	244.85	-35.8%	(2)/(1) - 1
(15) Ancillary Income per Exposure	1.94	0.44	-77.3%	(2)/(1) - 1
(16) Prospective Loss Trend	4.9%	9.2%	4.3%	(2) - (1)
(17) Prospective Premium Trend	2.3%	5.8%	3.5%	(2) - (1)
(18) Prospective Net Annual Trend = $[1+(16)]/[1+(17)] - 1$	2.5%	3.2%	0.7%	(2) - (1)
(19) Projected Ult Loss & DCC Ratio	81.0%	63.6%	-17.4%	(2) - (1)
(20) Peril % of Overall Adjusted Earned Premium	36.6%	38.8%	2.2%	(2) - (1)
(21) Peril % of Overall Ultimate Loss & DCC	36.3%	32.5%	-3.8%	(2) - (1)
(22) Min CDI Allowed Profit	-6.6%	-6.6%	0.0%	(2) - (1)
(23) Max CDI Allowed Profit	7.9%	7.9%	0.0%	(2) - (1)
(24) Investment Income Fixed	0.3%	0.3%	0.0%	(2) - (1)
(25) Investment Income Variable	5.2%	5.2%	0.0%	(2) - (1)
(26) Efficiency Standard	24.9%	24.9%	0.0%	(2) - (1)
(27) Min CDI Allowed Indicated Change	-7.5%	-27.2%	-19.7%	(2) - (1)
(28) Max CDI Allowed Indicated Change	11.0%	-12.6%	-23.6%	(2) - (1)
(29) Min CDI Allowed Indicated Premium	435.39	280.47	-35.6%	(2)/(1) - 1
(30) Max CDI Allowed Indicated Premium	522.64	336.67	-35.6%	(2)/(1) - 1

Notes:
 1. Values from GIC SERFF filing # USAA-130660642 and USAA SERFF filing # USAA-130660568, effective dates 12/28/2017.
 2. Losses from year ending Q2 2016.

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

EILEEN-GAYLE COLEMAN,
and ROBERT CASTRO, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

UNITED SERVICES
AUTOMOBILE ASSOCIATION
and USAA GENERAL
INDEMNITY COMPANY,

Defendants.

Case No. 3:21-cv-00217-CAB-KSC

DECLARATION OF BRUCE A. STROMBOM, PH.D.

June 2, 2022

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I. INTRODUCTION

A. Qualifications

1. My name is Bruce A. Strombom. I am a Senior Advisor at Analysis Group, Inc., an international economic, financial, and strategy consulting firm. Analysis Group employs over 1,000 staff, many with advanced degrees in economics, management, or statistics. I hold a Ph.D. in economics from the University of California, Irvine and a B.A. in economics from San Jose State University. My areas of specialization include applied microeconomics, industrial organization, and finance.

2. For the past 29 years, I have been employed as an economist and have served as a consulting and testifying expert in public policy matters and commercial litigation. Previously, I was Executive Vice President of Business Valuation for a middle market merger and acquisition firm and Manager in the Financial Advisory Services group of the public accounting firm Price Waterhouse. I have testified on topics involving economics, statistics and econometrics in numerous federal and state courts and in arbitrations. In that testimony, I have addressed issues related to class certification, liability, loss causation, and damages. I have served as an expert witness in several insurance-related litigations and provided testimony in insurance rate setting proceedings before various state insurance regulatory bodies and before the National Association of Insurance Commissioners. A resume detailing, *inter alia*, my experience, testimony within the past four years, and publications within the past ten years is attached to this report as **Appendix A**.

3. Analysis Group is compensated at a rate of \$900 per hour for the time I spend on this matter; the rates for other Analysis Group staff members assigned to this case range from \$350 to \$675 per hour. My compensation and that of Analysis Group are not dependent on the nature of my conclusions or the outcome of this matter.

B. Assignment

4. I have been retained by counsel for United Services Automobile Association (“United Services”) and USAA General Indemnity Company (“GIC”) (collectively, “USAA”) to, among other things, provide expert testimony on the issues of injury and damages in this matter

as they relate to the question of class certification. Specifically, I have been asked to comment on certain opinions presented in the Declarations of Jonathan Griglack (“Griglack Declaration”) and Allan Schwartz (“Schwartz Declaration”), dated April 6 and 7, 2022, respectively.¹ Subsequent to filing the Griglack Declaration, Mr. Griglack submitted an amended declaration dated May 23, 2022 (“Amended Griglack Declaration”).²

C. Documents Relied Upon

5. For this report, I and staff under my supervision have reviewed court documents as well as other materials provided through discovery in this case or obtained from public sources. In addition, I have reviewed information on premiums paid by GIC policyholders for a random sample of policies drawn from those analyzed in the Amended Griglack Declaration. The documents, materials and other information I have relied upon in conducting my analysis and in forming my opinions are listed in this report and/or in **Appendix B**.

6. My analysis and conclusions to date are based on the information available when this declaration was submitted. I reserve the right to amend my declaration and may modify, refine, or revise my opinions if new information is identified or otherwise becomes available.

D. Summary of Opinions

7. The following is a summary of my opinions:

- The Griglack Methodology and Mr. Schwartz’s Primary Damages Methodology are fundamentally flawed because they fail to consider that combining GIC policyholders and United Services policyholders into a single risk pool would cause but-for premiums to differ from the premiums United Services actually charged.
- The Griglack Methodology, which is based on 10 snapshots as of April 1 and October 1 for the years 2017 to 2021, does not calculate the amount of premium GIC policyholders actually paid. Thus, it also cannot be used to calculate but-for premiums.

¹ Declaration of Jonathan Griglack, April 6, 2022 (“Griglack Declaration”); Declaration of Allan I. Schwartz, April 7, 2022 (“Schwartz Declaration”).

² Amended Declaration of Jonathan Griglack, May 23, 2022 (“Amended Griglack Declaration”). For the purposes of my declaration, I respond to the opinions in the Amended Griglack Declaration.

- The Griglack Methodology is flawed because it does not address, let alone account for, the many material, individualized changes in rating characteristics of members of the proposed class that cause premiums to change in between the 10 snapshot dates, and during policyholders' six-month policy periods.
- To the extent that premiums change during the coverage period, the total premium actually paid by proposed class members will differ from the premiums calculated by the Griglack Methodology as of the snapshot dates.
- Mr. Griglack's claim that the Griglack Methodology can be used to "calculate exactly what [United Services] would have charged..." cannot be true in light the flaws discussed above. If the methodology does not calculate what GIC policyholders actually paid, then it cannot calculate what their United Services premium would have been, even ignoring the failure to consider how a combined risk pool would have affected but-for premiums.
- The frequency and magnitude of errors caused by the flaws in the Griglack Methodology indicate that the Griglack Methodology cannot reliably determine:
 - Which policyholders were injured as a consequence of the alleged misconduct (that is, the Griglack Methodology will identify some uninjured policyholders as injured, and vice versa);
 - Which policyholders meet the criteria for inclusion in the proposed class; and/or
 - The quantum of damages suffered by policyholders.

II. BACKGROUND

A. Putative Class

8. Eileen-Gayle Coleman and Robert Castro ("Plaintiffs") seek to certify two classes of "enlisted personnel who purchased automobile insurance policies that included collision coverage from Defendant USAA General Indemnity Company ('GIC')." ³ The two classes are comprised of: 1) Good Driver Class: "All (a) enlisted persons, (b) who at any time since February 4, 2017 had an automobile insurance policy including collision coverage from GIC, (c) who qualified as good drivers under Cal. Ins. Code 1861.025 and were not offered a good driver

³ Plaintiffs' Notice of Motion and Motion for Class Certification, *Eileen-Gayle Coleman, and Robert Castro, on behalf of themselves and all others similarly situated, v. United Services Automobile Association and USAA General Indemnity Company*, Case No. 3:21-cv-00217-CAB-LL, April 8, 2022 ("Motion for Class Certification"), p. 1.

discount from [United Services], (d) who paid more for that policy than they would have paid in [United Services], and (e) who, at any time in which clauses (a) through (d) have been satisfied, garaged vehicles in the State of California”⁴ and 2) Discrimination Class: “All (a) ‘enlisted’ persons, (b) who at any time since February 4, 2018 had an automobile insurance policy including collision coverage from GIC, (c) who paid more for that policy than they would have paid in [United Services], and (d) who, at any time in which clauses (a) through (c) have been satisfied, garaged vehicles in the State of California.”⁵ Plaintiffs filed suit on behalf of the two classes (the “Putative Class” or “Putative Class Members”).⁶

B. Plaintiffs’ Allegations

9. Plaintiffs allege that “United Services Automobile Association [United Services] and its subsidiary GIC harm members of the Good Driver Class by violating section 1861.16(b) of the California Insurance Code.”⁷ Plaintiffs also allege that Defendants “intentionally discriminate against enlisted military personnel and veterans,”⁸ “segregate enlisted personnel and military officers into different companies, GIC and [United Services],”⁹ and “charge enlisted personnel substantially higher rates for the same auto insurance coverage.”¹⁰

C. Overview of Mr. Griglack’s and Mr. Schwartz’s Analyses

10. The Amended Griglack Declaration purports to provide a methodology (the “Griglack Methodology”) to “determine the cost impact of USAA group’s risk classification system as it pertains to policyholders’ placement into GIC versus [United Services]”¹¹ and to “compare the premiums that GIC charged policyholders to those premiums that would have been

⁴ Motion for Class Certification, p. 11.

⁵ Motion for Class Certification, pp. 11-12.

⁶ Motion for Class Certification, p. 1.

⁷ Motion for Class Certification, p. 1.

⁸ Motion for Class Certification, p. 1.

⁹ Motion for Class Certification, p. 1.

¹⁰ Motion for Class Certification, p. 1.

¹¹ Amended Griglack Declaration, ¶ 3.

charged [by United Services] as of ten dates from 2017 through 2021.”¹² As of the date of his amended declaration, Mr. Griglack has only been able to compare the United Services and GIC premiums of the GIC policyholders for one date, October 1, 2019.¹³

11. Based on his analysis, Mr. Griglack concludes that “(a) when we are provided with accurate data concerning each GIC policyholder, we will be able to calculate exactly what [United Services] would have charged that person, and (b) in total, GIC charged its policyholders more than [United Services] would charge those same policyholders...”¹⁴ Mr. Griglack further concludes that “over 60% of policyholders...paid at least 10% more using GIC base rates and relativities than they would using [United Services] base rates and relativities.”¹⁵

12. Mr. Schwartz states that he was asked to “address the actuarial and insurance issues related to whether damages for the Plaintiffs can be evaluated on a class wide basis.”¹⁶ He opines that “a reasonable damage calculation would reflect the difference between the insurance premiums charged to the Plaintiffs by the Defendant GIC compared to what the appropriate premium should be consistent with actuarial and insurance practices and consistent with the applicable law.”¹⁷

13. Mr. Schwartz presents two damages formulas, his “Primary Damages Methodology” and his “Alternative Damages Methodology,”¹⁸ for calculating damages to each individual plaintiff. These formulas differ with respect to the premiums that would have been charged to GIC policyholders but-for the alleged misconduct. Mr. Schwartz’s Primary Damages Methodology “simply involves rating the GIC policyholders reflecting the [United Services] relativities and base rates.”¹⁹ His Alternate Damages Methodology applies “a numerical factor that would increase the dollar amount of [United Services] premium by the dollar amount of

¹² Amended Griglack Declaration, ¶ 3.

¹³ Amended Griglack Declaration, ¶¶ 26, 27.

¹⁴ Amended Griglack Declaration, ¶ 7.

¹⁵ Amended Griglack Declaration, ¶ 37.

¹⁶ Schwartz Declaration, ¶ 14.

¹⁷ Schwartz Declaration, ¶ 16.

¹⁸ Schwartz Declaration, ¶¶ 20, 21.

¹⁹ Schwartz Declaration, ¶ 20.

decrease in premium for GIC, thereby balancing against each other.”²⁰ In explaining his second methodology, Mr. Schwartz states that “the rates in [United Services] need to be adjusted upward to account for the revenue loss in GIC.”²¹ He opines that “the damage formula is conceptually very simple and can be implemented on a class wide basis, based upon automated computer calculations without the need with [sic] individualized inquiry, using information and data that is available from the Defendants.”²²

III. CRITIQUE OF PLAINTIFFS’ PROPOSED ANALYSIS

A. Mr. Griglack’s and Mr. Schwartz’s Analyses are Based on Flawed Methodologies

14. The Griglack Methodology and Mr. Schwartz’s Primary Damages Methodology²³ are fundamentally flawed because they fail to consider that combining GIC policyholders and United Services policyholders into a single risk pool would cause but-for premiums to differ from the premiums United Services actually charged.

15. From an economic perspective, a reliable method for determining injury and damages should answer the question: How would the plaintiff’s economic position have differed if the alleged misconduct had not occurred. Accordingly, damages analysis typically involves calculating the difference between the plaintiff’s economic position but-for the alleged misconduct (*i.e.*, their position in the “but-for world”) and their actual economic position (*i.e.*, their position in the “actual world”).²⁴

²⁰ Schwartz Declaration, ¶ 21.

²¹ Schwartz Declaration, ¶ 23.

²² Schwartz Declaration, ¶ 17.

²³ I have not been asked to evaluate Mr. Schwartz’s Alternative Damages Methodology.

²⁴ For example, the Reference Manual on Scientific Evidence notes that “[t]he first step in a damages study is the translation of the legal theory of the harmful event into an analysis of the economic impact of that event. In most cases, the analysis considers the difference between the plaintiff’s economic position if the harmful event had not occurred and the plaintiff’s actual economic position. [...] Damages measurement then determines the plaintiff’s hypothetical value in the but-for scenario. Economic damages are the difference between that value and the actual value that the plaintiff achieved.” (Allen, Mark A., et al., “Reference Guide on Estimation of Economic Damages,” *Reference Manual on Scientific Evidence*, 3rd Ed., 2011, Washington, D.C.: National Academies Press, p. 432.)

16. To reach a damages conclusion, a damages expert should apply reliable, tested, and supported theories—grounded in professional economic, financial, and industry principles—to the circumstances of the case and should not merely create mechanical calculations.²⁵ A valid damages calculation must take into consideration relevant issues, data or facts of the case, widely known principles, and facts of the industry in which the damages theory is applied. Failing to account for all factors will misrepresent the plaintiff’s economic position had the alleged misconduct not occurred.

17. In this case, plaintiffs’ theory of liability posits a but-for world in which GIC policyholders are charged premiums equal to those charged to otherwise identical United Services policyholders: *i.e.*, GIC and United Services apply the same rates and relativities to calculate their policyholders’ premiums. The question then becomes: if the Defendant were to charge the same rates and relativities to both groups of policyholders, what would their resulting premiums be? The Griglack Methodology and Mr. Schwartz’s Primary Damages Methodology assume that but-for premiums for GIC policyholders would be equal to the actual premiums charged to otherwise identical United Services policyholders. Neither Mr. Griglack nor Mr. Schwartz provide any economic justification for this assumption.

18. Moreover, the Griglack Methodology and Mr. Schwartz’s Primary Damages Methodology imply that GIC policyholders and United Services policyholders would have been combined into a single risk pool in the but-for world. However, if the GIC and United Services risk pools had been combined and the experience of both GIC and United Services policyholders had been considered in determining a common rate schedule, then the but-for rate schedule would not have been equal to United Services’ actual rate schedule.²⁶ I understand that it is undisputed that the current GIC rates are (on average) higher than the current United Services rates. In my opinion, it is fair to assume that the rates for a combined GIC and United Services risk pool would be higher than the current United Services rates, because the current United

²⁵ Evans, Elizabeth A., et al., “Damages Theories and Causation Issues,” *Litigation Services Handbook*, 2017, John Wiley & Sons, pp. 28–30; Allen, Mark A., et al., “Reference Guide on Estimation of Economic Damages,” *Reference Manual on Scientific Evidence*, 3rd Ed., 2011, Washington, D.C.: National Academies Press, pp. 431–432.

²⁶ Declaration of Quinn Saner, May 27, 2022 (“Saner Declaration”), ¶ 57.

Services rates would need to increase to account for the higher (on average) risks presented by the GIC policyholders.

19. The failure of the Griglack Methodology and Mr. Schwartz's Primary Damages Methodology to account for how a combined risk pool would have affected but-for premiums is a fundamental flaw that results in economically unsound and unreliable conclusions. This error will cause but-for premiums for GIC policyholders to be understated, cause the number of GIC policyholders who were injured and the number of proposed class members to be overstated (see Schwartz Exhibit B),²⁷ and cause damages to the proposed class to be overstated, resulting in a windfall to Plaintiffs by placing them in a better economic position than they would have been in absent the alleged misconduct.

B. The Griglack Methodology Does Not Reliably Determine the Fact of Injury for the Putative Class Members

20. Even ignoring its failure to consider that combining GIC policyholders and United Services policyholders into a single risk pool would cause but-for premiums to differ from the premiums United Services actually charged, the Griglack Methodology does not provide a way to “compare the premiums that GIC charged policyholders to those premiums that would have been charged under [United Services].”²⁸ As I explain below, the Griglack Methodology, which is based on snapshots as of April 1 and October 1 for the years 2017 to 2021, does not calculate the amount of premium GIC policyholders actually paid. Thus, it also cannot be used to calculate but-for premiums.

21. The Griglack Methodology is flawed because it does not address, let alone account for, the many material, individualized changes in rating characteristics of members of the proposed class (*e.g.*, adding or removing a vehicle, adding or removing an optional coverage, adding or removing a driver, changing coverage limits or deductibles, changing the “principally garaged” location, changing the estimate of annual miles driven, or recognizing a change in

²⁷ While this error will overstate the number of injured policyholders, I am unable to determine which particular policyholders are incorrectly identified by plaintiffs as injured, because that will depend on how the relative structure of but-for premiums (*i.e.*, specific base rates and relativities) would differ from United Services' actual premium and that is unknown.

²⁸ Amended Griglack Declaration, ¶ 3.

marital status²⁹) that cause premiums to change in between the 10 snapshot dates, and during policyholders' six-month policy periods.³⁰ To the extent that premiums change during the coverage period, the total premium actually paid by proposed class members will differ from the premiums calculated by the Griglack Methodology as of the snapshot dates.

22. For example, consider a hypothetical policy that provides coverage for two vehicles from September 1, 2019, through February 28, 2020, and has an initial premium of \$1,600 for the coverage period. Assume that on November 1, 2019, one third of the way through the coverage period, the policyholder moves to a different city and their premium is reduced to \$1,300. Assume further that on January 1, 2020, they adjust their annual mileage estimate and their premium is reduced to \$1,000 and that no other changes occur during the policy period. In this case, the policy holder would pay total premiums of \$1,300 over the six-month policy period. However, the Griglack Methodology would calculate only the premium that was in effect as of the snapshot date (*i.e.*, October 1, 2019) when the premium was \$1,600. Using \$1,600 as the premium over the entire coverage period would overstate the actual premium paid by the policyholder by \$300 in this example. Nowhere in either the Amended Griglack Declaration, or the Schwartz Declaration, is this issue discussed or addressed. In fact, when asked about this problem during his deposition, Mr. Griglack admitted accounting for all the mid-period changes in premium would require him to examine "all transactions for every policyholder, which doesn't seem like a reasonable ask, given the amount of transaction[s] that there could be within any time frame."³¹

²⁹ Saner Declaration, ¶ 41.

³⁰ In this declaration, I adopt the definition of "rating factor" used in the Amended Griglack Declaration, which includes "rating factors" identified by the CDI, "subcategories of rating factors" and "rating characteristics." (*See*, Amended Griglack Declaration, footnotes 3 and 4).

³¹ Deposition of Jonathan Griglack, May 16, 2022, ("Griglack Deposition") at 131:19–132:7 ("Q. Okay. So... let's take an example, then, where you're coming up with an expected premium for six months, starting on 10/1 of 2019, but then there are changes during that six months that affect... the actual amount of premium that's charged and collected from a policyholder. Wouldn't you need to know the dates of those changes and what those changes were to accurately calculate what the United Services' premium would be? ... A. In that instance, then we would essentially need all transactions for every policyholder, which doesn't seem like a reasonable ask given the amount of transaction [sic] that there could be within any time frame.").

23. To evaluate the potential significance of this flaw, I selected a simple random sample from among the policies analyzed by Mr. Griglack.³² I selected 100 policies, and, after excluding five policies from my analysis that were canceled and not renewed during the policy period³³ and one policy due to an inconsistency with the premium amounts, my final sample consisted of 94 policies that were in effect as of October 1, 2019, the date that Mr. Griglack analyzed. For this random sample of policies, I was provided with information on the policyholders' premiums as well as information on any changes to the policies during the relevant policy period.

24. I analyzed this sample of policies to determine how frequently premiums changed during the six-month policy period, and the magnitude of premium changes when they occurred. My analysis shows that premiums change frequently during the period when policies are in effect and that the magnitude of the premium changes is often material. For example:

- a) Approximately 30 percent of sample policies (28 of 94 policies) had at least one change in premium during the six-month policy period so that the premium in effect as of October 1, 2019, was not in effect over the entire policy period.
- b) For the 30 percent of sample policies for which the premium changed during the policy period:
 - i. Premiums changed an average of approximately 1.5 times during the policy period: 18 policies had one change, seven policies had two changes, two policies had three changes, and one policy had four changes. **See Exhibit 1.**
 - ii. 39 percent of policies experienced a premium change of more than 10 percent relative to the original premium. **See Exhibit 2.**
 - iii. 43 percent of the policies experienced a premium change of more than \$100 relative to the original premium. **See Exhibit 3.**

25. To further evaluate how this issue affects the reliability of the Griglack Methodology, I compared the premiums actually paid by the sample policyholders over the term of the policy to the effective premium as of October 1, 2019 (*i.e.*, the premium that would be

³² In order to create the random sample of 100 policies, I imported a list of all policy numbers analyzed by Mr. Griglack into SAS and generated a random number between 0 and 1 to be associated with each policy number. I then sorted the policies by the generated random number in descending order and selected the first 100.

³³ The Griglack Methodology also does not account for mid-period policy cancellations.

calculated using the Griglack Methodology).³⁴ This difference is a measure of the error that would be introduced by using the effective premium as of October 1, 2019, as a proxy for the actual premium over the term of the policy. For the sample policies for which the premium changed during the policy period, the average error from applying the Griglack Methodology is 9.9 percent and ranges up to 70.2 percent. For the sample policies for which the premium changed during the policy period, the average error from applying the Griglack Methodology is \$73.30 and ranges up to \$298.98. **See Exhibit 4.**

26. In addition to analyzing the sample of policies, I reviewed data provided by USAA for named plaintiff Robert Castro. Mr. Castro made several changes to his GIC insurance policy that was in effect as of October 1, 2019. The policy's effective date was September 5, 2019, and the policy expired on March 5, 2020. During that period, Mr. Castro made three changes to his policy that affected his premiums: 1) changed the principally garaged location of his vehicles, 2) increased the annual mileage on his vehicles, and 3) added medical payments coverage.³⁵ As a result of those changes, Mr. Castro paid a total premium for the six-month policy of \$1,311.21. However, as of October 1, 2019, prior to Mr. Castro making any changes, the quoted premium was \$1,202.89.³⁶ Thus, Mr. Castro actually paid \$108.32 (or 9.0 percent) more than the premium as of October 1, 2019, that would be calculated by the Griglack Methodology.

27. Based on the analysis discussed above, Mr. Griglack's claim that the Griglack Methodology can be used to "calculate exactly what [United Services] would have charged..."³⁷ cannot be true in light the error rate and magnitude of errors described above for the sample policies and for Mr. Castro's policy. If the methodology does not calculate what GIC policyholders actually paid, as the analysis above demonstrates, then it cannot calculate what

³⁴ For purpose of this analysis, I assume that, given complete and accurate inputs, the Griglack Methodology is capable for producing a premium as of the snapshot date that is equal to the actual effective premium as of that date. However, I note that due to what are characterized as "[v]arious data issues," this is not established in the Amended Griglack Declaration. *See* Amended Griglack Declaration, ¶ 33.

³⁵ USAA00000623-628; USAA00000643-658.

³⁶ PR-21530 Coleman v USAA Class Action.xlsx.

³⁷ Amended Griglack Declaration, ¶ 7.

their United Services premium would have been, even ignoring the failure to consider how a combined risk pool would have affected but-for premiums.

28. Moreover, the errors caused by the Griglack Methodology's reliance on snapshots as the amount that policyholders actually paid for their policies are material in evaluating whether the methodology can reliably determine who is injured under Plaintiffs' legal theories (*i.e.*, Mr. Griglack's calculation of the differences for policyholders between GIC and United Services premiums). For example, Mr. Griglack reports that the difference between GIC and United Services premiums is 10 percent or less for approximately 36 percent of all policyholders.³⁸ In comparison, as discussed above, the difference between premiums actually paid by the sample policyholders and the effective premium as of October 1, 2019, for the 30 percent of sample policyholders for whom these values differed, averaged 9.9 percent and ranged up to 70.2 percent. Based on these error rates, the 36 percent of all policyholders for which Mr. Griglack determined the difference between GIC and United Services premiums is 10 percent or less may be mischaracterized as injured when they may not have been injured (or vice versa): the average error produced by the Griglack Methodology is approximately equal in magnitude (9.9 percent) to the maximum difference that Mr. Griglack calculates between GIC and United Services premiums (10 percent) for this group. Because the Amended Griglack Declaration only includes estimated premiums for a single snapshot date, it is impossible to calculate exactly how many GIC policyholders will be erroneously labeled as injured under the Griglack Methodology. But errors of this frequency and magnitude indicate that the Griglack Methodology cannot reliably determine:

- Which policyholders were injured as a consequence of the alleged misconduct (that is, the Griglack Methodology will identify some uninjured policyholders as injured, and vice versa);
- Which policyholders meet the criteria for inclusion in the proposed class; and/or
- The quantum of damages suffered by policyholders.

29. When asked during his deposition about the problem described in this section of my declaration, Mr. Griglack testified that he could apply a "ratio" to correct for differences

³⁸ Amended Griglack Declaration, ¶ 37.

between a policyholder's quoted premium and the actual premium collected that resulted from changes in the policyholder's rating factors. He described his proposed correction as follows: "...I believe it would have to be what was being charged [by GIC] divided by what was being calculated [using the Griglack Methodology]. Because then once you apply that to what's being calculated for United Services, that would, in theory, give you a charged amount [for United Services]. Or a good representation of what the charged amount would be."³⁹ Mr. Griglack's proposed solution is flawed and does not adequately address the errors that arise from using the Griglack Methodology when premiums change during the policy period.

30. Mr. Griglack's proposed ratio solution will, in general, fail when a change in rating factor that causes the intra-policy premium change involves rating factors for which the relativities differ between United Services and GIC. In his amended declaration, Mr. Griglack identifies seven rating factors that he concedes have different relativities between United Services and GIC: 1) pure premium band; 2) increased limit factors (BI/PD); 3) premier operator discount; 4) years of driving experience; 5) conviction surcharges; 6) accident surcharges; and 7) annual mileage.⁴⁰ To the extent that any of these factors for which the pertinent relativities differ changed during the policy period, Mr. Griglack's proposed ratio of "what was being charged" to "what was being calculated" for GIC will be different from the corresponding ratio for United Services.⁴¹ Applying the GIC ratio to the United Services premium calculated using the Griglack Methodology, as Mr. Griglack proposed at his deposition, will not yield the correct premium that would be charged by United Services for the affected policyholder in these cases.

31. To illustrate the flaws with Mr. Griglack's proposed ratio, I developed a simplified hypothetical example of a bodily injury premium calculation using actual GIC and

³⁹ Griglack Deposition at 130:21-131:1. Mr. Schwartz similarly testified that he could use a "ratio" to address premium changes during the policy period. (Deposition of Allan Schwartz, May 18, 2022, ("Schwartz Deposition") at 137:1-142:21). My criticisms of Mr. Griglack's proposed methodology apply equally to Mr. Schwartz's proposed methodology.

⁴⁰ Amended Griglack Declaration, ¶ 15.

⁴¹ I note that the intra-policy changes in premium for named plaintiff Robert Castro discussed in paragraph 26 above, involved two of these seven rating factors: 1) change in pure premium band caused by a change of the principally garaged location of his vehicles, and 2) increase in the annual mileage for his vehicles. Consequently, Mr. Griglack's proposed ratio solution would not correct the error in the premium for this named plaintiff caused by using the Griglack Methodology.

United Services relativities.⁴² **See Exhibit 5.** In this example, I assume the policyholder increased their bodily injury limits from \$100,000/\$200,000 to \$300,000/\$500,000 one month into the six-month policy period. As a result of this change to the policy, the GIC increased limit factor relativity would increase from 1.44 to 1.64 and the six-month premium would increase from \$228.41 to \$257.69. However, if this same policy was priced according to United Services rates, the increased limit factor relativity would increase from 1.62 to 1.93 and the premium would increase from \$262.87 to \$309.65. The total amount paid by the GIC policyholder over the six-month policy period would have been \$252.81.⁴³ Based on the initial premium amount of \$228.41, Mr. Griglack's would calculate a ratio of 1.107.⁴⁴ Applying this ratio to the initial United Services premium of \$262.87, Mr. Griglack would then calculate a United Services premium of \$290.95. However, due to differences in the increased limit factor relativities between GIC and United Services, the actual United Services premium paid by the policyholder would have been \$301.85. Thus, by applying a ratio to attempt to adjust for mid-policy changes, Mr. Griglack's would calculate a United Services premium that was 3.6% lower than the actual United Services premium. This error would also cause Mr. Griglack to overestimate the policyholder's alleged damages.

32. The magnitude and direction of the error resulting from applying Mr. Griglack's ratio to attempt to correct the United Services premium estimate produced by the Griglack Methodology will depend on the values of the relativities involved in any particular intra-policy change in premium. This example demonstrates that Mr. Griglack's proposed solution does not eliminate the error discussed in this section of my declaration when the change in rating factor that causes the intra-policy premium change involves a rating factor for which the relativities differ between United Services and GIC.

⁴² CASTRO_001293.xlsm.

⁴³ $\$252.81 = 1/6 * \$228.41 + 5/6 * 257.69.$

⁴⁴ $1.107 = \$252.81 / \$228.41.$

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Signed on the 2nd day of June 2022 in Los Angeles, California.



Bruce A. Strobom

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Bruce Strombom is an expert in applied microeconomics, finance, and quantitative and statistical analysis. He provides assistance to attorneys in all phases of pretrial and trial practice, prepares economic and financial models, and provides expert testimony in litigation and public policy matters. Dr. Strombom has conducted assessments of class certification, liability, and damages issues in cases involving antitrust, breach of contract, ERISA, false advertising, intellectual property, labor and employment, product liability, securities, and general commercial disputes.

Prior to joining Analysis Group, Dr. Strombom was Executive Vice President of a middle-market merger and acquisition firm, where he managed a financial and market research organization that provided valuation and consulting services to over 500 privately held companies annually. Previously, he was Consulting Manager at Price Waterhouse, where he provided litigation support and value enhancement consulting services, and Senior Financial Analyst at the Tribune Company, where he evaluated capital projects and acquisition candidates. Dr. Strombom holds a Ph.D. in economics from the University of California, Irvine, and a B.A. in economics from San Jose State University.

EDUCATION

Ph.D. Economics, University of California, Irvine
Fields: Finance and Industrial Organization
Thesis: Switching Cost, Price Sensitivity and Health Plan Choice

B.A. Economics, San Jose State University, San Jose, CA

PROFESSIONAL EXPERIENCE

2022 Senior Advisor, Analysis Group, Inc., Los Angeles, CA

2004 – 2021 Managing Principal, Analysis Group, Inc., Los Angeles, CA

1993 – 2004 Senior Associate and Vice President, Analysis Group, Inc., Los Angeles, CA

1992 Regional General Manager, Prodata, Inc., Sacramento, CA

1985 – 1991 Executive Vice President, Geneva Business Research Corp., Irvine, CA

1983 – 1985 Manager of Consulting Services, Price Waterhouse, Newport Beach, CA

1981 – 1983 Senior Financial Analyst, Tribune Newspapers West, Woodland Hills, CA

TESTIMONY AT DEPOSITION OR TRIAL IN THE LAST FOUR YEARS

General Commercial Litigation

- **American Healthcare Administrative Service, et al. v. Lance Aizen**
Superior Court of the State of California, County of Placer
Calculate the amount due to the former CEO from termination of an employment agreement and evaluate company performance relative to forecasts (deposition).
- **Patrick Calhoun, et al., v. Google LLC**
United States District Court, Northern District of California, San Jose Division
Evaluate plaintiffs' proposed method for identifying members of the class, establishing injury and calculating damages to users of the web browser Chrome caused by Google's alleged unlawful collection and use of personal information (expert report and deposition).
- **Taqueria El Primo LLC, et al. v. Farmers Group, Inc., et al.**
United States District Court, District of Minnesota
Examine economic issues related to alleged harm to consumers who purchased no-fault automobile insurance caused by "no-bill" agreements with certain health care providers (declarations, expert report and deposition).
- **Eric Fishon, et al. v. Peloton Interactive, Inc.**
United States District Court, Southern District of New York
Evaluate whether the methodologies proposed by plaintiffs can be used to calculate damages on a class-wide basis using evidence common to proposed class members (expert report and deposition).
- **Sherris Minor, et al. v. Baker Mills, Inc. and Kodiak Cakes**
United States District Court, Northern District of California
Assess whether the methodologies proposed by plaintiffs can be used to calculate damages on a class-wide basis using evidence common to proposed class members (expert report and deposition).
- **Byron Jackson, et al. v. Anheuser-Busch Companies, LLC**
United States District Court, Southern District of Florida, Miami Division
Evaluate whether marketplace evidence indicates a price premium associated with alleged false advertising and whether any price premium is common to the proposed class (expert report and deposition).
- **John Nypl, et al. v. JPMorgan Chase & Co., et al.**
United States District Court, Southern District of New York
Evaluate whether plaintiffs can determine, using class-wide proof, the fact of antitrust injury and the amount of damages to members of a proposed class of retail foreign exchange customers caused by alleged manipulation of spot rates by a cartel of traders in interbank foreign currency markets (expert report and deposition).
- **In re: Brinker Data Incident Litigation**
United States District Court, Middle District of Florida
Evaluate whether plaintiffs demonstrated common impact across putative class members and whether the proposed methodologies for calculating class-wide damages related to an alleged data breach are reliable (expert declaration and deposition).

- **RCS Creditor Trust v. Nicholas S. Schorsch, et al.**
The Court of Chancery of the State of Delaware
Evaluate economic evidence related to the level of compensation paid to broker-dealers of non-traded REITs (expert report, deposition and testimony at trial).
- **Camille Cabrera, et al. v. Bayer Healthcare LLC and Bayer Corporation**
United States District Court, Central District of California
Evaluate whether data on transaction prices and volumes support claims of a price premium associated with an allegedly false label claim and whether the proposed methodology can be used to calculate damages to consumers of childrens' vitamins on a classwide basis (expert reports and deposition).
- **Stanley F. Frompovicz, et al. v. Niagara Bottling, LLC**
United States District Court, Eastern District of Pennsylvania
Examine economic issues related to class certification and determine whether economic impact and damages to spring water extractors and bottlers can be determined on a classwide basis (expert report and deposition).
- **Dikla Gavrieli v. Kfir Gavrieli**
Superior Court of the State of California, County of Los Angeles
Determine the value of a digital native vertical retailer at various dates and rebut plaintiff's damages calculation (depositions and testimony at trial).
- **Debbie Krommenhock, et al. v. Post Foods LLC**
United States District Court, Northern District of California
Assess whether plaintiffs' proposed use of conjoint analysis provides a reliable method of calculating class-wide damages in this matter involving alleged misleading health claims on boxes of Post cereal (expert reports and deposition).
- **Iconlab Inc., et al. v. Valeant Pharmaceuticals International, Inc., et al.**
United States District Court, Central District of California, Southern Division
Evaluate lost profits and unjust enrichment in this matter involving alleged misappropriation of trade secrets related to the sale of intraocular lenses in Turkey and India (expert report and deposition).
- **Denis Marc Audet, et al. v. Stuart A. Fraser, et al.**
United States District Court, District of Connecticut
Review economic evidence related to class certification in this matter involving the sale of virtual currency mining equipment and cloud-hosted mining and the initial coin offering of the cryptocurrency Paycoin (expert reports and depositions).
- **M et al. v. Mizuho Bank and Mark Karpeles**
United States District Court, Northern District of Illinois, Eastern Division
Evaluate economic issues related to class certification in this matter involving the bankruptcy of the bitcoin exchange Mt. Gox (expert report and deposition).
- **Maricopa County v. Office Depot, Inc.**
United States District Court, District of Arizona
Calculate damages from the alleged failure to comply with the terms of a contract that guaranteed the plaintiff the lowest prices offered by the defendant (expert report and deposition).

ERISA

- **Kevin Moitoso, et al. v. FMR LLC, et al.**
United States District Court, District of Massachusetts
Evaluate whether a defined contribution retirement plan and its members incurred economic losses attributable to alleged breaches of fiduciary duty under ERISA (expert reports, declarations and deposition).
- **Theresa Brown, et al. v. Nationwide Life Insurance Company, et al.**
United States District Court, Southern District of Ohio Eastern Division at Columbus
Assess, from an economic perspective, whether claims that Nationwide charged unreasonable asset-based fees for the provision of recordkeeping and other administrative service can be evaluated on a class-wide basis (expert report and deposition).
- **Steve Wildman, et al. v. American Century Services, LLC, et al.**
United States District Court, Western District of Missouri
In this ERISA class action involving claims that a 401(k) plan sponsor breached fiduciary duties, plan fees were excessive and investment options were imprudent, evaluate whether liability and damages can be determined on a class-wide basis without individualized inquiry and evaluate plaintiffs' damages estimate (expert reports, deposition and testimony at trial).

Health Care and Health Insurance

- **Jennifer Bennett, et al. v. Quest Diagnostics, Inc.**
United States District Court, District of New Jersey
Evaluate plaintiffs' proposed method for identifying members of proposed classes, determining "fair and reasonable" prices for laboratory tests and calculating damages sustained by each member of the proposed classes (expert report and deposition).
- **In re Ranbaxy Generic Drug Application Antitrust Litigation**
United States District Court, District of Massachusetts
Evaluate economic issues related to certification of a class of third party payors and calculate damages from the allegedly wrongfully obtained first-to-file exclusivity for generic versions of Diovan, Valcyte and Nexium (expert report and deposition).
- **In re Glumetza Antitrust Litigation**
United States District Court, Northern District of California
US District Court for the Northern District of California
Evaluate whether antitrust injury to each putative class member can be proven with common evidence and whether the proposed method for calculating aggregate overcharges through common evidence is reliable (expert reports and depositions).
- **In re Zetia (Ezetimibe) Antitrust Litigation**
United States District Court, Eastern District of Virginia, Norfolk Division
Examine economic issues related to the certification of a class of direct purchasers (expert reports and deposition).

- **The Hospital Authority of Metropolitan Government of Nashville and Davidson County Tennessee, et al. v. Momenta Pharmaceuticals, Inc., et al.**
United States District Court, Middle District of Tennessee, Nashville Division
Evaluate the proposed method of calculating class-wide damages to end-payers from the alleged manipulation of the generic approval process and resulting delay of generic entry and determine to what extent increased prices at the manufacturer level impact prices paid by end-payers (expert report and deposition).
- **In re Loestrin 24 FE Antitrust Litigation**
United States District Court, District of Rhode Island
Evaluate availability of an administratively feasible method for ascertaining the members of a proposed end-payor class and the economic role of PBMs in retail prescription drug transactions (expert report, deposition and testimony at hearing).
- **Francis Fenwick, et al. v. Ranbaxy Pharmaceuticals, et al.**
United States District Court, District of New Jersey
Evaluate plaintiffs' proposed methodology for identifying class members and calculating damages on a class-wide basis to consumers who purchased generic atorvastatin that may have contained a foreign material (expert report and deposition).
- **In re Wellbutrin XL Antitrust Litigation**
United States District Court, Eastern District of Pennsylvania
Evaluate the ascertainability of members of a class of indirect purchasers given risk-sharing arrangements in the distribution of pharmaceuticals and the “pass-on” of health care costs by health plans in the form of higher premiums (expert reports and deposition).

Title Insurance

- **In The Matter of First American Title Insurance Company Market Conduct Examination**
Before the Indiana Commissioner of Insurance
Review and evaluate the methods of statistical sampling, extrapolation and calculation of alleged overcharges and premium tax underpayments used in the Department of Insurance's Market Conduct Examination (expert report, deposition and testimony at hearing).

Automotive

- **Mary Quackenbush, et al. v. American Honda Motor Company, Inc., et al.**
United States District Court, Northern District of California
Evaluate economic issues related to class certification including plaintiffs' proposed use of the cost to repair an alleged defect in variable timing control actuators as a measure of benefit of the bargain damages (expert report and deposition).
- **Barry Rebuk, et al. v. Ford Motor Company of Canada, et al.**
Ontario (Canada) Superior Court of Justice
Evaluate whether representations of fuel consumption ratings based on an older 2-cycle Testing Method resulted in overcharges for Ford vehicles sold in Canada (expert reports and cross examination).

- **Ronald Garcia, et al. v. Harley Davidson Motor Company Group, LLC**
United States District Court, Northern District of California
Evaluate economic issues related to class certification including plaintiffs’ proposed use of the cost to repair an alleged defect in ABS as a measure of benefit of the bargain damages (expert report and deposition).
- **Biljana Capic, et al. v. Ford Motor Company of Australia Limited**
Federal Court of Australia, District Registry: New South Wales
Evaluate the plaintiffs’ method of calculating excess depreciation, diminution in value at the point of initial purchase and other harm resulting from allegedly defective transmissions in certain Ford vehicles (expert reports and testimony at trial).
- **Shawn Alger, et al. v. FCA US LLC**
United States District Court, Eastern District of California
Evaluate plaintiffs’ proposed use of replacement cost as a measure of classwide damages caused by allegedly defective active head restraint systems (expert report and deposition).
- **In re: FCA US LLC Monostable Electronic Gearshift Litigation**
United States District Court, Eastern District of Michigan, Southern Division
Analyze used car prices for evidence of diminution of value resulting from alleged defects in electronic gearshifts (expert reports and depositions).
- **Tom Kondash, et al. v. Kia Motors America and Kia Motors Corp.**
United States District Court, Southern District of Ohio
Evaluate the plaintiffs' proposed method of calculating class-wide damages resulting from alleged defects in panoramic sunroofs (expert report and deposition).
- **Billy Glenn, et al. v. Hyundai Motor America, et al.**
United States District Court, Central District of California
Evaluate the plaintiffs' proposed method of calculating class-wide damages and conduct a statistical analysis of the fracture rates of conventional and panoramic sunroofs (expert report and deposition).
- **Margie Daniel, et al. v. Ford Motor Company**
United States District Court, Eastern District of California
Evaluate repair costs for fleet vehicles for evidence of excess tire wear and review prices of used car transactions for evidence of excess depreciation in the Ford Focus (expert report, deposition and testimony at trial).

PAPERS AND PRESENTATIONS

“Product Liability Litigation Involving Pharmaceuticals and Medical Devices: How Has It Changed in the Big Data/Social Media Era?” Law and Economics Symposium, MIT Sloan, Samberg Center, May 6 2019, Cambridge, MA.

“Using Cash Flows Versus Accrual Net Income,” (co-author), *Calculation of Lost Profits Damages – Theory and Practice*, 1st ed., Everett and Kinrich, eds., Valuation Products and Services LLC, 2017.

“Competition in Title Insurance Markets Since the Great Recession,” presented at the National Conference of Insurance Legislators, Summer Meeting, July 11, 2013, Philadelphia, PA.

“Use The Right Model For Auto Defect Suits,” Law360, July 09, 2013.

“Class Certification and Damages Theories: Consumers’ Valuation of Un-priced Product Attributes,” presented at a Webinar continuing legal education forum sponsored by Ballard Spahr, May 16, 2012.

“Statistical Analyses in Proactive Audits and Employment Litigation,” presented at a Webinar continuing legal education forum for attorneys sponsored by Analysis Group, Inc. May 20, 2009.

“The Subprime Mortgage Crisis and Disclosures: What Went Wrong?” presented at a Webinar continuing legal education forum for attorneys sponsored by Analysis Group, Inc., July 29, 2008

“The Subprime Mortgage Crisis and Disclosures: What Went Wrong?” presented at a continuing education forum for attorneys sponsored by Analysis Group, Inc., June 24, 2008, San Francisco, CA.

“Subprime Litigation: A Survival Guide,” presented at Institutional Investor Legal Forum Summer Roundtable, June 18, 2008, Santa Monica, CA.

“Subprime Lending Litigation,” Program Co-chair at a continuing education forum for attorneys sponsored by CLE International, May 8 and 9, 2008, Los Angeles, CA.

“Reductions in Force: Strategies to Minimize Litigation Risk in Downsizing,” presented at a continuing education forum for attorneys sponsored by K&L Gates, January 17, 2008, New York, NY.

“Investigation of Racial Profiling by the LAPD – Pedestrian and Motor Vehicle Post-Stop Data Analysis Report,” City of Los Angeles, July 2006.

“An Assessment of Competition in California Title Insurance and Escrow Markets,” with Bruce Stangle, report prepared for First American Title Insurance Company, August 30, 2006.

“Evaluation of Proposed Regulations for the California Title Insurance and Escrow Industry,” with Bruce Stangle, report prepared for First American Title Insurance Company, August 30, 2006.

“Competition and Title Insurance Rates in California,” with Bruce Stangle, report prepared for First American Title Insurance Company, January 23, 2006.

“Competition and Title Insurance Prices in California,” report and presentation to the National Association of Insurance Commissioners (NAIC), Title Insurance Working Group, June 2006, Washington DC.

“Switching Cost, Price Sensitivity and Health Plan Choice,” *Journal of Health Economics* 21, January 2002, p. 89-116.

“Risk Selection Caused by the Correlation of Health Status and Sensitivity to Price,” Research in Health Care Financial Management Symposium, August 2001, Best Research Paper Award.

Appendix B Documents Relied Upon

Declarations

Amended Declaration of Jonathan Griglack, May 23, 2022

Declaration of Allan I. Schwartz, April 7, 2022

Declaration of Jonathan Griglack, April 6, 2022

Declaration of Quinn Saner, May 27, 2022

Legal Filings

Plaintiffs' Notice of Motion and Motion for Class Certification, *Eileen-Gayle Coleman, and Robert Castro, on behalf of themselves and all others similarly situated, v. United Services Automobile Association and USAA General Indemnity Company*, Case No. 3:21-cv-00217-CAB-LL, April 8, 2022

Depositions

Deposition of Allan Schwartz, May 18, 2022

Deposition of Jonathan Griglack, May 16, 2022

Bates-Stamped Documents

CASTRO_001293.xlsm

USAA00000623-628

USAA00000643-658

Other Documents

PR-21530 Coleman v USAA Class Action.xlsx

Publicly-Available Documents

Allen, Mark A., et al., "Reference Guide on Estimation of Economic Damages," *Reference Manual on Scientific Evidence*, 3rd Ed., 2011, Washington, D.C.: National Academies Press

Evans, Elizabeth A., et al., "Damages Theories and Causation Issues," *Litigation Services Handbook*, 2017, John Wiley & Sons

EXHIBIT D1

Exhibit 1
Number of Premium Changes per Policy in Random Sample

Number of Changes	Frequency
0	66
1	18
2	7
3	2
4	1
Subtotal	28
Average for Policies with At Least One Change	1.5

Notes:

[1] Of the 100 policies in the random sample, only 94 are included in the analysis. Five policies are removed because they were cancelled and one policy was removed due to an inconsistency with the premium amounts.

[2] In instances where multiple changes occur on a single day for a policy, only one change is counted.

Source:

PR-21530 Coleman v USAA Class Action.xlsx

EXHIBIT D2

Exhibit 2
Premium Changes as a Percentage of Initial Premium in Random Sample

Percentage Change Range	Frequency	Percentage of Policies with a Premium Change
-50% to -40%	1	4%
-40% to -30%	0	0%
-30% to -20%	0	0%
-20% to -10%	3	11%
-10% to 0	11	39%
0 to 10%	6	21%
10% to 20%	2	7%
20% to 30%	3	11%
30% to 40%	0	0%
40% to 50%	1	4%
> 50%	1	4%
Total	28	100%
Policies with a Premium Change of More Than 10%	11	39%

Note:

[1] Of the 100 policies in the random sample, only 94 are included in the analysis. Five policies are removed because they were cancelled and one policy was removed due to an inconsistency with the premium amounts.

Source:

PR-21530 Coleman v USAA Class Action.xlsx

EXHIBIT D3

Exhibit 3
Premium Changes in Dollars in Random Sample

Dollar Change Range	Frequency	Percentage of Policies with a Premium Change
< -\$300	1	4%
-\$300 to -\$200	3	11%
-\$200 to -\$100	1	4%
-\$100 to 0	10	36%
0 to \$100	6	21%
\$100 to \$200	4	14%
\$200 to \$300	2	7%
\$300 to \$400	1	4%
Total	28	100%
Policies with a Premium Change of More Than \$100	12	43%

Note:

[1] Of the 100 policies in the random sample, only 94 are included in the analysis. Five policies are removed because they were cancelled and one policy was removed due to an inconsistency with the premium amounts.

Source:

PR-21530 Coleman v USAA Class Action.xlsx

EXHIBIT D4

Exhibit 4
Summary of Premium Differences in Random Sample
As of October 1, 2019

	[A] Policy Number	[B] Total Premium Paid	[C] October 1, 2019 Premium	[D] = [B] - [C] Difference	[E] = [D] / [C] Percent Difference
1	289202151	\$738.86	\$887.23	-\$148.37	-16.7%
2	779202928	\$834.61	\$991.21	-\$156.60	-15.8%
3	686204133	\$2,035.79	\$2,334.77	-\$298.98	-12.8%
4	638902257	\$614.13	\$663.53	-\$49.40	-7.4%
5	835502439	\$2,096.74	\$2,227.27	-\$130.53	-5.9%
6	140702897	\$471.57	\$497.13	-\$25.56	-5.1%
7	368403569	\$1,266.36	\$1,324.29	-\$57.93	-4.4%
8	649303169	\$1,552.48	\$1,585.32	-\$32.84	-2.1%
9	012703161	\$1,751.45	\$1,778.21	-\$26.76	-1.5%
10	427704619	\$454.14	\$458.04	-\$3.90	-0.9%
11	163902575	\$1,129.94	\$1,133.41	-\$3.47	-0.3%
12	142502020	\$926.89	\$927.15	-\$0.26	0.0%
13	513702568	\$1,417.70	\$1,412.48	\$5.22	0.4%
14	731302165	\$943.20	\$939.10	\$4.10	0.4%
15	542701768	\$901.47	\$891.91	\$9.56	1.1%
16	950104162	\$2,677.34	\$2,629.44	\$47.90	1.8%
17	460202897	\$1,032.16	\$1,012.45	\$19.71	1.9%
18	831802498	\$527.59	\$514.25	\$13.34	2.6%
19	410804014	\$1,148.42	\$1,118.89	\$29.53	2.6%
20	900603688	\$1,933.51	\$1,859.33	\$74.18	4.0%
21	499004443	\$1,076.23	\$1,013.57	\$62.66	6.2%
22	150904622	\$724.53	\$679.19	\$45.34	6.7%
23	275003676	\$252.44	\$235.46	\$16.98	7.2%
24	675302428	\$830.41	\$760.35	\$70.06	9.2%
25	866003821	\$1,596.48	\$1,432.74	\$163.74	11.4%
26	054203500	\$1,081.96	\$871.78	\$210.18	24.1%
27	188304482	\$452.11	\$292.93	\$159.18	54.3%
28	406904768	\$451.41	\$265.20	\$186.21	70.2%
Average (absolute value)				\$73.30	9.9%

Note:

[1] Of the 100 policies in the random sample, only 94 are included in the analysis. Five policies are removed because they were cancelled and one policy was removed due to an inconsistency with the premium amounts.

Source:

PR-21530 Coleman v USAA Class Action.xlsx

EXHIBIT D5

Exhibit 5

Hypothetical Example of Mid-Policy Change in Rating Factor where Relativity Differs Between GIC and United Services

Change in Increased Limit Factors from 100,000/200,000 to 300,000/500,000

	October		November -March		Six-month Total	
	GIC	United Services	GIC	United Services	GIC	United Services
Base Rate	\$ 428.94	\$ 341.72	\$ 428.94	\$ 341.72		
I/L or Deductible Factor	1.44	1.62	1.64	1.93		
Pure Premium Band Factor	0.95	1.05	0.95	1.05		
Years Driving Experience	0.82	0.88	0.82	0.88		
Gender	1.00	1.00	1.00	1.00		
Marital Status	0.90	0.90	0.90	0.90		
Conviction Factor	1.00	1.00	1.00	1.00		
Accident Factor	1.00	1.00	1.00	1.00		
Premier Operator Discount	0.80	0.85	0.80	0.85		
Annual Mileage	0.76	0.78	0.76	0.78		
Expense Fee	22.50	22.50	22.50	22.50		
Good Driver Discount	0.80	0.80	0.80	0.80		
Bodily Injury Premium	\$ 228.41	\$ 262.87	\$ 257.69	\$ 309.65	\$ 252.81	\$ 301.85
			Mr. Griglack's Ratio (Six-month total/October GIC)		1.107	
			Adjusted United Services Premium using Mr. Griglack's Ratio		\$ 290.95	
			Error in GIC Premium using October GIC premium		-9.6%	
			Error in United Services premium using Mr. Griglack's Ratio		-3.6%	

Source:

CASTRO_001293.xlsm.

EXHIBIT E

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

EILEEN-GAYLE COLEMAN,
and ROBERT CASTRO, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

UNITED SERVICES
AUTOMOBILE ASSOCIATION
and USAA GENERAL
INDEMNITY COMPANY,

Defendants.

Case No. 3:21-cv-00217-CAB-KSC

EXPERT REPORT OF BRUCE A. STROMBOM, PH.D.

October 17, 2022

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I. INTRODUCTION

A. Qualifications

1. My name is Bruce A. Strombom. I am a Senior Advisor at Analysis Group, Inc., an international economic, financial, and strategy consulting firm. Analysis Group employs over 1,000 staff, many with advanced degrees in economics, management, or statistics. I hold a Ph.D. in economics from the University of California, Irvine and a B.A. in economics from San Jose State University. My areas of specialization include applied microeconomics, industrial organization, and finance.

2. For the past 29 years, I have been employed as an economist and have served as a consulting and testifying expert in public policy matters and commercial litigation. Previously, I was Executive Vice President of Business Valuation for a middle market merger and acquisition firm and Manager in the Financial Advisory Services group of the public accounting firm Price Waterhouse. I have testified on topics involving economics, statistics and econometrics in numerous federal and state courts and in arbitrations. In that testimony, I have addressed issues related to class certification, liability, loss causation, and damages. I have served as an expert witness in several insurance-related litigations and provided testimony in insurance rate setting proceedings before various state insurance regulatory bodies and before the National Association of Insurance Commissioners. A resume detailing, *inter alia*, my experience, testimony within the past four years, and publications within the past ten years is attached to this report as **Appendix A**.

3. Analysis Group is compensated at a rate of \$900 per hour for the time I spend on this matter; the rates for other Analysis Group staff members assigned to this case range from \$350 to \$675 per hour. My compensation and that of Analysis Group are not dependent on the nature of my conclusions or the outcome of this matter.

B. Assignment

4. I have been retained by counsel for United Services Automobile Association (“United Services”) and USAA General Indemnity Company (“GIC”) (collectively, “USAA”) to, among other things, provide expert testimony on the issues of injury and damages in this matter.

Specifically, I have been asked to evaluate Plaintiffs' experts' proposed damages methodology in light of certain economic principles of damages analysis that I believe are applicable to this case. My understanding of Plaintiffs' experts' proposed methodology is based upon the previously filed Declarations of Jonathan Griglack dated May 23, 2022, ("Amended Griglack Declaration") and Allan Schwartz dated April 7, 2022 ("Schwartz Declaration").¹ I have previously submitted a declaration and supplemental declaration in this matter addressing economic issues related to class certification.²

C. Documents Relied Upon

5. For this report, I and staff under my supervision have reviewed court documents as well as other materials provided through discovery in this case or obtained from public sources. The documents, materials and other information I have relied upon in conducting my analysis and in forming my opinions are listed in this report and/or in **Appendix B**.

6. My analysis and conclusions to date are based on the information available when this report was submitted. I reserve the right to amend my report and may modify, refine, or revise my opinions if new information is identified or otherwise becomes available.

D. Summary of Opinions

7. The following is a summary of my opinions:

- From an economic perspective, a proper damages calculation must consider whether, and to what extent, a plaintiff suffered economic harm as a result of the alleged misconduct. Damages analyses typically measure the difference between the stream of economic value the plaintiff has or will receive, given the alleged misconduct and the stream of economic value the plaintiff likely would have received if the alleged misconduct had not occurred. The calculation of damages thus requires two values: 1) the economic state of the plaintiff in the actual world and 2) the economic state of the plaintiff in the but-for world in which the alleged misconduct did not occur. Damages are the difference between these two values.

¹ Amended Declaration of Jonathan Griglack, May 23, 2022 ("Amended Griglack Declaration"); Declaration of Allan I. Schwartz, April 7, 2022 ("Schwartz Declaration"). Mr. Griglack also filed a declaration on April 6, 2022, that I understand was superseded by the Amended Griglack Declaration.

² Declaration of Bruce A. Strombom, June 2, 2022; Supplemental Declaration of Bruce A. Strombom, July 1, 2022.

- The Griglack Methodology and Mr. Schwartz’s Primary Damages Methodology are fundamentally flawed because they fail to consider that combining GIC policyholders and United Services policyholders into a single risk pool would cause premiums in the but-for world to differ from the premiums United Services actually charged.
- The Griglack Methodology, which is based on 10 snapshots as of April 1 and October 1 for the years 2017 to 2021, does not calculate the amount of premium GIC policyholders actually paid. Thus, it also cannot be used to calculate but-for premiums.
 - The Griglack Methodology is flawed because it does not address, let alone account for, the many material, individualized changes in rating characteristics of members of the proposed class that cause premiums to change in between the 10 snapshot dates, and during policyholders’ six-month policy periods.
 - To the extent that premiums change during the coverage period, the total premium actually paid by proposed class members will differ from the premiums calculated by the Griglack Methodology as of the snapshot dates.
 - 12 of the Named Plaintiffs’ 19 six-month policies (63 percent) had at least one policy adjustment that affected the policy premium during the policy period such that the initial premium (*i.e.*, the premium as of the effective date of the policy) was *not* equal to the total premium actually paid by the policyholder.

II. BACKGROUND

A. Putative Class

8. Eileen-Gayle Coleman and Robert Castro (“Plaintiffs”) seek to certify two classes of “enlisted personnel who purchased automobile insurance policies that included collision coverage from Defendant USAA General Indemnity Company (“GIC”).”³ The two classes are comprised of: 1) Good Driver Class: “All (a) enlisted persons, (b) who at any time since February 4, 2017 had an automobile insurance policy including collision coverage from GIC, (c) who qualified as good drivers under Cal. Ins. Code 1861.025 and were not offered a good driver discount from [United Services], (d) who paid more for that policy than they would have paid in

³ Plaintiffs’ Notice of Motion and Motion for Class Certification, *Eileen-Gayle Coleman, and Robert Castro, on behalf of themselves and all others similarly situated, v. United Services Automobile Association and USAA General Indemnity Company*, Case No. 3:21-cv-00217-CAB-LL, April 8, 2022 (“Motion for Class Certification”), p. 1.

[United Services], and (e) who, at any time in which clauses (a) through (d) have been satisfied, garaged vehicles in the State of California”⁴ and 2) Discrimination Class: “All (a) ‘enlisted’ persons, (b) who at any time since February 4, 2018 had an automobile insurance policy including collision coverage from GIC, (c) who paid more for that policy than they would have paid in [United Services], and (d) who, at any time in which clauses (a) through (c) have been satisfied, garaged vehicles in the State of California.”⁵ Plaintiffs filed suit on behalf of the two classes (the “Putative Class” or “Putative Class Members”).⁶

B. Plaintiffs’ Allegations

9. Plaintiffs allege that “United Services Automobile Association [United Services] and its subsidiary GIC harm members of the Good Driver Class by violating section 1861.16(b) of the California Insurance Code.”⁷ Plaintiffs also allege that Defendants “intentionally discriminate against enlisted military personnel and veterans,”⁸ “segregate enlisted personnel and military officers into different companies, GIC and [United Services],”⁹ and “charge enlisted personnel substantially higher rates for the same auto insurance coverage.”¹⁰

C. Overview of Mr. Griglack’s and Mr. Schwartz’s Analyses

10. The Amended Griglack Declaration purports to provide a methodology (the “Griglack Methodology”) to “determine the cost impact of USAA group’s risk classification system as it pertains to policyholders’ placement into GIC versus [United Services]”¹¹ and to “compare the premiums that GIC charged policyholders to those premiums that would have been

⁴ Motion for Class Certification, p. 11.

⁵ Motion for Class Certification, pp. 11-12.

⁶ Motion for Class Certification, p. 1.

⁷ Motion for Class Certification, p. 1.

⁸ Motion for Class Certification, p. 1.

⁹ Motion for Class Certification, p. 1.

¹⁰ Motion for Class Certification, p. 1.

¹¹ Amended Griglack Declaration, ¶ 3.

charged [by United Services] as of ten dates from 2017 through 2021.”¹² As of the date of his amended declaration, Mr. Griglack had only been able to compare the United Services and GIC premiums of the GIC policyholders for one date, October 1, 2019.¹³

11. Based on his analysis, Mr. Griglack concluded that “(a) when we are provided with accurate data concerning each GIC policyholder, we will be able to calculate exactly what [United Services] would have charged that person, and (b) in total, GIC charged its policyholders more than [United Services] would charge those same policyholders...”¹⁴ Mr. Griglack further concluded that “over 60% of policyholders...paid at least 10% more using GIC base rates and relativities than they would using [United Services] base rates and relativities.”¹⁵

12. Mr. Schwartz stated that he was asked to “address the actuarial and insurance issues related to whether damages for the Plaintiffs can be evaluated on a class wide basis.”¹⁶ He opined that “a reasonable damage calculation would reflect the difference between the insurance premiums charged to the Plaintiffs by the Defendant GIC compared to what the appropriate premium should be consistent with actuarial and insurance practices and consistent with the applicable law.”¹⁷

13. In the Schwartz Declaration, Mr. Schwartz presents two damages formulas, his “Primary Damages Methodology” and his “Alternative Damages Methodology,”¹⁸ for calculating damages to each individual plaintiff. These formulas differ with respect to the premiums that would have been charged to GIC policyholders but-for the alleged misconduct. Mr. Schwartz’s Primary Damages Methodology “simply involves rating the GIC policyholders reflecting the [United Services] relativities and base rates.”¹⁹ His Alternate Damages Methodology applies “a numerical factor that would increase the dollar amount of [United

¹² Amended Griglack Declaration, ¶ 3.

¹³ Amended Griglack Declaration, ¶¶ 26, 27.

¹⁴ Amended Griglack Declaration, ¶ 7.

¹⁵ Amended Griglack Declaration, ¶ 37.

¹⁶ Schwartz Declaration, ¶ 14.

¹⁷ Schwartz Declaration, ¶ 16.

¹⁸ Schwartz Declaration, ¶¶ 20, 21.

¹⁹ Schwartz Declaration, ¶ 20.

Services] premium by the dollar amount of decrease in premium for GIC, thereby balancing against each other.”²⁰ In explaining his second methodology, Mr. Schwartz stated that “the rates in [United Services] need to be adjusted upward to account for the revenue loss in GIC[.]”²¹ He opined that “the damage formula is conceptually very simple and can be implemented on a class wide basis, based upon automated computer calculations without the need with [sic] individualized inquiry, using information and data that is available from the Defendants.”²²

III. CRITIQUE OF PLAINTIFFS’ PROPOSED ANALYSIS

A. Principles of Economic Damages Estimation

14. From an economic perspective, a reliable method for determining injury and damages should answer the question: How would the plaintiff’s economic position have differed if the alleged misconduct had not occurred? Accordingly, damages analysis typically involves calculating the difference between the plaintiff’s economic position but-for the alleged misconduct (*i.e.*, their position in the “but-for world”) and their actual economic position (*i.e.*, their position in the “actual world”). As noted in the Reference Manual on Scientific Evidence:

[T]he first step in a damages study is the translation of the legal theory of the harmful event into an analysis of the economic impact of that event. In most cases, the analysis considers the difference between the plaintiff’s economic position if the harmful event had not occurred and the plaintiff’s actual economic position. [...] Damages measurement then determines the plaintiff’s hypothetical value in the but-for scenario. Economic damages are the difference between that value and the actual value that the plaintiff achieved.²³

15. To reach a damages conclusion, a damages expert should apply reliable, tested, and supported theories—grounded in professional economic, financial, and industry principles—

²⁰ Schwartz Declaration, ¶ 21.

²¹ Schwartz Declaration, ¶ 23.

²² Schwartz Declaration, ¶ 17.

²³ Allen, Mark A., et al., “Reference Guide on Estimation of Economic Damages,” *Reference Manual on Scientific Evidence*, 3rd Ed., 2011, Washington, D.C.: National Academies Press, p. 432.

to the circumstances of the case and should not merely create mechanical calculations.²⁴ A valid damages calculation must take into consideration relevant issues, data or facts of the case, widely known principles, and facts of the industry in which the damages theory is applied. Failing to account for all factors will misrepresent the plaintiff's economic position had the alleged misconduct not occurred.

16. In this case, plaintiffs' theory of liability posits a but-for world in which GIC policyholders who are members of the Putative Class are charged premiums equal to those charged to otherwise identical United Services policyholders: *i.e.*, GIC and United Services apply the same rates and relativities to calculate their policyholders' premiums. The question that must be answered to calculate damages then becomes: if the Defendant were to have charged the same rates and relativities to both groups of policyholders, what would their resulting premiums have been? Those resulting premiums would then need to be compared to the premiums actually paid by GIC policyholders. The Griglack Methodology does not calculate the amount of premiums GIC policyholders actually paid and the Griglack Methodology and Mr. Schwartz's Primary Damages Methodology assume, incorrectly in my opinion, that but-for premiums for GIC policyholders would have been equal to the actual premiums charged to otherwise identical United Services policyholders.

B. Mr. Griglack's and Mr. Schwartz's Proposed Methodologies Fail to Consider That Combining GIC Policyholders into a Single Risk Pool Would Cause But-for Premiums to Differ From the Premiums United Services Actually Charged

17. The Griglack Methodology and Mr. Schwartz's Primary Damages Methodology²⁵ are fundamentally flawed because they fail to consider that a but-for world in which both GIC policyholders and United Services policy holders are charged the same rates and relativities, those rates would, on average, be higher than the actual rates charged by United Services. Charging both sets of policyholders identical rates and relativities is economically equivalent to

²⁴ Evans, Elizabeth A., et al., "Damages Theories and Causation Issues," *Litigation Services Handbook*, 2017, John Wiley & Sons, pp. 28–30; Allen, Mark A., et al., "Reference Guide on Estimation of Economic Damages," *Reference Manual on Scientific Evidence*, 3rd Ed., 2011, Washington, D.C.: National Academies Press, pp. 431–432.

²⁵ I have not been asked to evaluate Mr. Schwartz's Alternative Damages Methodology.

combining these policyholders into a single risk pool. Combining GIC policyholders and United Services policyholders into a single risk pool would cause but-for premiums to differ from the premiums United Services actually charged.

18. While the Griglack Methodology and Mr. Schwartz's Primary Damages Methodology assume that but-for premiums for GIC policyholders would have been equal to the actual premiums charged to otherwise identical United Services policyholders, neither Mr. Griglack nor Mr. Schwartz provide any economic justification for this assumption. Both of these methodologies imply that GIC policyholders and United Services policyholders would have been combined into a single risk pool in the but-for world. However, if the GIC and United Services risk pools had been combined and the experience of both GIC and United Services policyholders had been considered in determining a common rate schedule, then the but-for rate schedule would not have been equal to United Services' actual rate schedule.²⁶ I understand that it is undisputed that the current GIC rates are (on average) higher than the current United Services rates. In my opinion, it is reasonable to assume that the rates for a combined GIC and United Services risk pool would be higher than the current United Services rates, because the current United Services rates would need to increase to account for the higher (on average) risks presented by the GIC policyholders.

19. The failure of the Griglack Methodology and Mr. Schwartz's Primary Damages Methodology to account for how a combined risk pool would have affected but-for premiums is a fundamental flaw that results in economically unsound and unreliable conclusions. This error will cause but-for premiums for GIC policyholders to be understated, cause the number of GIC policyholders who were injured and the number of proposed class members to be overstated (*see* Schwartz Exhibit B),²⁷ and cause damages to the proposed class to be overstated, resulting in a windfall to Plaintiffs by placing them in a better economic position than they would have been in absent the alleged misconduct.

²⁶ Declaration of Quinn Saner, May 27, 2022 ("Saner Declaration"), ¶ 57.

²⁷ While this error will overstate the number of injured policyholders, I am unable to determine which particular policyholders are incorrectly identified by plaintiffs as injured, because that will depend on how the relative structure of but-for premiums (*i.e.*, specific base rates and relativities) would differ from United Services' actual premium and that is unknown.

C. The Proposed Griglack Methodology Is Not Capable of Calculating Either Actual or But-For Premiums

20. Even ignoring its failure to consider that combining GIC policyholders and United Services policyholders into a single risk pool would cause but-for premiums to differ from the premiums United Services actually charged, the Griglack Methodology does not provide a way to “compare the premiums that GIC charged policyholders to those premiums that would have been charged under [United Services].”²⁸ As I explain below, the Griglack Methodology, which is based on snapshots as of April 1 and October 1 for the years 2017 to 2021, does not calculate the amount of premium GIC policyholders actually paid. Thus, it also cannot be used to calculate but-for premiums.

21. The Griglack Methodology is flawed because it does not address, let alone account for, the many material, individualized changes in rating characteristics of members of the proposed class (*e.g.*, adding or removing a vehicle, adding or removing an optional coverage, adding or removing a driver, changing coverage limits or deductibles, changing the “principally garaged” location, changing the estimate of annual miles driven, or recognizing a change in marital status²⁹) that cause premiums to change in between the 10 snapshot dates, and during policyholders’ six-month policy periods.³⁰ To the extent that premiums change during the coverage period, the total premium actually paid by proposed class members will differ from the premiums calculated by the Griglack Methodology as of the snapshot dates.

22. For example, consider a hypothetical policy that provides coverage for two vehicles from September 1, 2019, through February 28, 2020, and has an initial premium of \$1,600 for the coverage period. Assume that on November 1, 2019, one third of the way through the coverage period, the policyholder moves to a different city and their premium is reduced to \$1,300. Assume further that on January 1, 2020, they adjust their annual mileage estimate and their premium is reduced to \$1,000 and that no other changes occur during the policy period. In

²⁸ Amended Griglack Declaration, ¶ 3.

²⁹ Saner Declaration, ¶ 41.

³⁰ In this report, I adopt the definition of “rating factor” used in the Amended Griglack Declaration, which includes “rating factors” identified by the CDI, “subcategories of rating factors” and “rating characteristics.” (*See* Amended Griglack Declaration, footnotes 3 and 4).

this case, the policy holder would pay total premiums of \$1,300 over the six-month policy period. However, the Griglack Methodology would calculate only the premium that was in effect as of the snapshot date (*i.e.*, October 1, 2019) when the premium was \$1,600. Using \$1,600 as the premium over the entire coverage period would overstate the actual premium paid by the policyholder by \$300 in this example. Nowhere in either the Amended Griglack Declaration, or the Schwartz Declaration, is this issue discussed or addressed. In fact, when asked about this problem during his deposition, Mr. Griglack admitted accounting for all the mid-period changes in premium would require him to examine “all transactions for every policyholder, which doesn’t seem like a reasonable ask, given the amount of transaction[s] that there could be within any time frame.”³¹

23. To provide evidence of the prevalence of this problem, I have reviewed histories of the premiums paid by the Named Plaintiffs in this matter from 2017 to 2021 to determine how often the premiums changed during the coverage period.

24. My review of the Named Plaintiffs’ policies shows that policy adjustments occur frequently during the periods when policies were in effect and that the magnitude of the premium changes associated with policy adjustments is often material. For example:

- a) Approximately 63 percent of the Named Plaintiffs’ policies (12 of 19 policies) had at least one policy adjustment that affected the policy premium during the six-month policy period so that the initial premium (*i.e.*, the premium as of the effective date of the policy) was *not* equal to the total premium actually paid by the policyholder.
- b) For the 63 percent of the Named Plaintiffs’ policies for which there was at least one policy adjustment during the policy period:
 - i. Policy adjustments occurred an average of approximately 1.75 times during the six-month policy period: six policies had one adjustment, three policies had two adjustments, and three policies had three adjustments. **See Exhibit 1.**

³¹ Deposition of Jonathan Griglack, May 16, 2022, at 131:19–132:7 (“Q. Okay. So... let’s take an example, then, where you’re coming up with an expected premium for six months, starting on 10/1 of 2019, but then there are changes during that six months that affect... the actual amount of premium that’s charged and collected from a policyholder. Wouldn’t you need to know the dates of those changes and what those changes were to accurately calculate what the United Services’ premium would be? ... A. In that instance, then we would essentially need all transactions for every policyholder, which doesn’t seem like a reasonable ask given the amount of transaction [sic] that there could be within any time frame.”).

- ii. The differences between initial premiums and premiums actually paid ranged from -8.3 percent to 139.3 percent. **See Exhibit 1.**
- iii. For 58 percent of the Named Plaintiffs' policies (7 of 12 policies), the difference between the initial premium and amount actually paid was more than five percent. **See Exhibit 1.**
- iv. For 25 percent of the Named Plaintiffs' policies (3 of 12 policies), the difference between the initial premium and the amount actually paid was more than 10 percent. **See Exhibit 1.**
- v. For 42 percent of the Named Plaintiffs' policies (5 of 12 policies), the difference between the initial premium and the amount actually paid was more than \$100. **See Exhibit 1.**

25. To further evaluate how this issue affects the reliability of the Griglack Methodology, I compared the total premiums actually paid by the Named Plaintiffs during Mr. Griglack's entire analysis period (2017-2021) to the initial premiums at the start of the coverage periods. This difference provides an indication of the magnitude of the net error in estimated GIC premiums actually paid that would be introduced by the failure to account for adjustments to premiums during the policy periods. For Ms. Coleman's policies, the net error is 4.1 percent (\$546.14 / \$13,194.74). For Mr. Castro's policies, the net error is 7.4 percent (\$977.58 / \$13,210.13). **See Exhibit 1.**

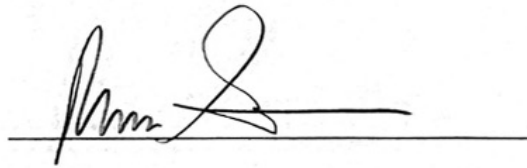
26. Based on the analysis discussed above, Mr. Griglack's claim that the Griglack Methodology can be used to "calculate exactly what [United Services] would have charged..."³² cannot be true in light the error rate and magnitude of errors described above for the Named Plaintiffs' policies. If the Plaintiffs' experts' methodology does not calculate what GIC policyholders actually paid, as the analysis above demonstrates, then it cannot calculate what their United Services premium would have been, even ignoring the failure to consider how a combined risk pool would have affected but-for premiums.

D. Conclusion

27. In this matter, economic damages are the difference between the GIC premiums actually paid by proposed class members and the premiums they would have paid in a but-for

³² Amended Griglack Declaration, ¶ 7.

world in which GIC premiums and United Services premiums were equal. The assumption underlying the Griglack Methodology and Mr. Schwartz's Primary Damages Methodology – that in the but-for world, premiums paid by proposed class members would have been based on United Services actual rates and relativities – is unsupported and economically incorrect. This false assumption would cause damages to be overstated, resulting in a windfall to proposed class members by placing them in a better economic position than they would have been in absent the alleged misconduct. Furthermore, Mr. Griglack's reliance on ten snapshot dates to calculate premiums renders his proposed methodology incapable of reliably calculating either actual or but-for premiums. Without a reliable estimate of premiums, it is not possible to reliably calculate damages.

A handwritten signature in black ink, appearing to read 'Bruce A. Strombom', is written over a solid horizontal line.

Bruce A. Strombom

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Bruce Strombom is an expert in applied microeconomics, finance, and quantitative and statistical analysis. He provides assistance to attorneys in all phases of pretrial and trial practice, prepares economic and financial models, and provides expert testimony in litigation and public policy matters. Dr. Strombom has conducted assessments of class certification, liability, and damages issues in cases involving antitrust, breach of contract, ERISA, false advertising, intellectual property, labor and employment, product liability, securities, and general commercial disputes.

Prior to joining Analysis Group, Dr. Strombom was Executive Vice President of a middle-market merger and acquisition firm, where he managed a financial and market research organization that provided valuation and consulting services to over 500 privately held companies annually. Previously, he was Consulting Manager at Price Waterhouse, where he provided litigation support and value enhancement consulting services, and Senior Financial Analyst at the Tribune Company, where he evaluated capital projects and acquisition candidates. Dr. Strombom holds a Ph.D. in economics from the University of California, Irvine, and a B.A. in economics from San Jose State University.

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1992 Regional General Manager, Prodata, Inc., Sacramento, CA

1985 – 1991 Executive Vice President, Geneva Business Research Corp., Irvine, CA

1983 – 1985 Manager of Consulting Services, Price Waterhouse, Newport Beach, CA

1981 – 1983 Senior Financial Analyst, Tribune Newspapers West, Woodland Hills, CA

TESTIMONY AT DEPOSITION OR TRIAL IN THE LAST FOUR YEARS

General Commercial Litigation

- **Chasom Brown, et al. v. Google LLC**
United States District Court, Northern District of California
Evaluate plaintiffs' methods of calculating the value of personal information allegedly received by Google while users were in private browsing mode, computing Google's profit from the use of such information and determining whether all members of the proposed class were injured (declaration and deposition).
- **John Cepelak, et al v. HP Inc.**
United States District Court, Northern District of California
Review and comment on plaintiffs' proposed method of calculating the value of color ink used when printing black and white documents using certain HP printers (expert report and deposition).
- **Kimberly Banks, et al. v. R.C. Bigelow, Inc.**
United States District Court, Central District of California
Evaluate plaintiffs' proposed method of determining the price premium caused by the allegedly false claim that certain Bigelow tea products were manufactured in the USA (declaration and deposition).
- **Eileen-Gayle Coleman, et al. v. United Services Automobile Association (USAA)**
United States District Court, Southern District of California
Assess whether the fact of injury and the quantum of damages to members of a class of automobile insurance policyholders can be determine using common proof (expert reports and deposition).
- **American Healthcare Administrative Service, et al. v. Lance Aizen**
Superior Court of the State of California, County of Placer
Calculate the amount due to the former CEO from termination of an employment agreement and evaluate company performance relative to forecasts (deposition).
- **Patrick Calhoun, et al., v. Google LLC**
United States District Court, Northern District of California, San Jose Division
Evaluate plaintiffs' proposed method for identifying members of the class, establishing injury and calculating damages to users of the web browser Chrome caused by Google's alleged unlawful collection and use of personal information (expert report and deposition).
- **Taqueria El Primo LLC, et al. v. Farmers Group, Inc., et al.**
United States District Court, District of Minnesota
Examine economic issues related to alleged harm to consumers who purchased no-fault automobile insurance caused by "no-bill" agreements with certain health care providers (declarations, expert report and deposition).
- **Eric Fishon, et al. v. Peloton Interactive, Inc.**
United States District Court, Southern District of New York
Evaluate whether the methodologies proposed by plaintiffs can be used to calculate damages on a class-wide basis using evidence common to proposed class members (expert report and deposition).

- **Sherris Minor, et al. v. Baker Mills, Inc. and Kodiak Cakes**
United States District Court, Northern District of California
Assess whether the methodologies proposed by plaintiffs can be used to calculate damages on a class-wide basis using evidence common to proposed class members (expert report and deposition).
- **Byron Jackson, et al. v. Anheuser-Busch Companies, LLC**
United States District Court, Southern District of Florida, Miami Division
Evaluate whether marketplace evidence indicates a price premium associated with alleged false advertising and whether any price premium is common to the proposed class (expert report and deposition).
- **John Nypl, et al. v. JPMorgan Chase & Co., et al.**
United States District Court, Southern District of New York
Evaluate whether plaintiffs can determine, using class-wide proof, the fact of antitrust injury and the amount of damages to members of a proposed class of retail foreign exchange customers caused by alleged manipulation of spot rates by a cartel of traders in interbank foreign currency markets (expert report and deposition).
- **In re: Brinker Data Incident Litigation**
United States District Court, Middle District of Florida
Evaluate whether plaintiffs demonstrated common impact across putative class members and whether the proposed methodologies for calculating class-wide damages related to an alleged data breach are reliable (expert declaration and deposition).
- **RCS Creditor Trust v. Nicholas S. Schorsch, et al.**
The Court of Chancery of the State of Delaware
Evaluate economic evidence related to the level of compensation paid to broker-dealers of non-traded REITs (expert report, deposition and testimony at trial).
- **Camille Cabrera, et al. v. Bayer Healthcare LLC and Bayer Corporation**
United States District Court, Central District of California
Evaluate whether data on transaction prices and volumes support claims of a price premium associated with an allegedly false label claim and whether the proposed methodology can be used to calculate damages to consumers of childrens' vitamins on a classwide basis (expert reports and deposition).
- **Stanley F. Frompovicz, et al. v. Niagara Bottling, LLC**
United States District Court, Eastern District of Pennsylvania
Examine economic issues related to class certification and determine whether economic impact and damages to spring water extractors and bottlers can be determined on a classwide basis (expert report and deposition).
- **Dikla Gavrieli v. Kfir Gavrieli**
Superior Court of the State of California, County of Los Angeles
Determine the value of a digital native vertical retailer at various dates and rebut plaintiff's damages calculation (depositions and testimony at trial).

- **Debbie Krommenhock, et al. v. Post Foods LLC**
United States District Court, Northern District of California
Assess whether plaintiffs' proposed use of conjoint analysis provides a reliable method of calculating class-wide damages in this matter involving alleged misleading health claims on boxes of Post cereal (expert reports and deposition).
- **Iconlab Inc., et al. v. Valeant Pharmaceuticals International, Inc., et al.**
United States District Court, Central District of California, Southern Division
Evaluate lost profits and unjust enrichment in this matter involving alleged misappropriation of trade secrets related to the sale of intraocular lenses in Turkey and India (expert report and deposition).
- **Denis Marc Audet, et al. v. Stuart A. Fraser, et al.**
United States District Court, District of Connecticut
Review economic evidence related to class certification in this matter involving the sale of virtual currency mining equipment and cloud-hosted mining and the initial coin offering of the cryptocurrency Paycoin (expert reports and depositions).
- **Gregory Greene, et al. v. Mizuho Bank and Mark Karpeles**
United States District Court, Northern District of Illinois, Eastern Division
Evaluate economic issues related to class certification in this matter involving the bankruptcy of the bitcoin exchange Mt. Gox (expert report and deposition).
- **Maricopa County v. Office Depot, Inc.**
United States District Court, District of Arizona
Calculate damages from the alleged failure to comply with the terms of a contract that guaranteed the plaintiff the lowest prices offered by the defendant (expert report and deposition).

ERISA

- **Kevin Moitoso, et al. v. FMR LLC, et al.**
United States District Court, District of Massachusetts
Evaluate whether a defined contribution retirement plan and its members incurred economic losses attributable to alleged breaches of fiduciary duty under ERISA (expert reports, declarations and deposition).
- **Theresa Brown, et al. v. Nationwide Life Insurance Company, et al.**
United States District Court, Southern District of Ohio Eastern Division at Columbus
Assess, from an economic perspective, whether claims that Nationwide charged unreasonable asset-based fees for the provision of recordkeeping and other administrative service can be evaluated on a class-wide basis (expert report and deposition).
- **Steve Wildman, et al. v. American Century Services, LLC, et al.**
United States District Court, Western District of Missouri
In this ERISA class action involving claims that a 401(k) plan sponsor breached fiduciary duties, plan fees were excessive and investment options were imprudent, evaluate whether liability and damages can be determined on a class-wide basis without individualized inquiry and evaluate plaintiffs' damages estimate (expert reports, deposition and testimony at trial).

Health Care and Health Insurance

- **Value Drug Co., et al. v. Takeda Pharmaceuticals U.S.A., Inc., et al.**
United States District Court, Eastern District of Pennsylvania
Determine the number of proposed class members and comment on plaintiffs' claim of antitrust injury to members of a proposed class of direct purchasers of Colcrys (colchicine) caused by an alleged conspiracy between a group of brand and generic manufacturers to delay generic competition (expert report and deposition).
- **KPH Healthcare Services, Inc. v. Gilead Sciences, Inc., et al.**
United States District Court, Northern District of California
Evaluate economic issues related to class certification and determine the number of putative members of a class of direct purchasers of three fix dose combination antiretroviral drugs for the treatment of HIV (expert report and testimony at deposition).
- **Jennifer Bennett, et al. v. Quest Diagnostics, Inc.**
United States District Court, District of New Jersey
Evaluate plaintiffs' proposed method for identifying members of proposed classes, determining "fair and reasonable" prices for laboratory tests and calculating damages sustained by each member of the proposed classes (expert report and deposition).
- **In re Ranbaxy Generic Drug Application Antitrust Litigation**
United States District Court, District of Massachusetts
Evaluate economic issues related to certification of a class of third party payors and calculate damages from the alleged wrongfully obtained first-to-file exclusivity for generic versions of Diovan, Valecyte and Nexium (expert report and deposition).
- **In re Glumetza Antitrust Litigation**
United States District Court, Northern District of California
Evaluate whether antitrust injury to each putative class member can be proven with common evidence and whether the proposed method for calculating aggregate overcharges through common evidence is reliable (expert reports and depositions).
- **In re Zetia (Ezetimibe) Antitrust Litigation**
United States District Court, Eastern District of Virginia, Norfolk Division
Examine economic issues related to the certification of a class of direct purchasers (expert reports and deposition).
- **The Hospital Authority of Metropolitan Government of Nashville and Davidson County Tennessee, et al. v. Momenta Pharmaceuticals, Inc., et al.**
United States District Court, Middle District of Tennessee, Nashville Division
Evaluate the proposed method of calculating class-wide damages to end-payors from the alleged manipulation of the generic approval process and resulting delay of generic entry and determine to what extent increased prices at the manufacturer level impact prices paid by end-payors (expert report and deposition).

- **In re Loestrin 24 FE Antitrust Litigation**
United States District Court, District of Rhode Island
Evaluate availability of an administratively feasible method for ascertaining the members of a proposed end-payor class and the economic role of PBMs in retail prescription drug transactions (expert report, deposition and testimony at hearing).
- **Francis Fenwick, et al. v. Ranbaxy Pharmaceuticals, et al.**
United States District Court, District of New Jersey
Evaluate plaintiffs' proposed methodology for identifying class members and calculating damages on a class-wide basis to consumers who purchased generic atorvastatin that may have contained a foreign material (expert report and deposition).
- **In re Wellbutrin XL Antitrust Litigation**
United States District Court, Eastern District of Pennsylvania
Evaluate the ascertainability of members of a class of indirect purchasers given risk-sharing arrangements in the distribution of pharmaceuticals and the “pass-on” of health care costs by health plans in the form of higher premiums (expert reports and deposition).

Title Insurance

- **In The Matter of First American Title Insurance Company Market Conduct Examination**
Before the Indiana Commissioner of Insurance
Review and evaluate the methods of statistical sampling, extrapolation and calculation of alleged overcharges and premium tax underpayments used in the Department of Insurance's Market Conduct Examination (expert report, deposition and testimony at hearing).

Automotive

- **Mary Quackenbush, et al. v. American Honda Motor Company, Inc., et al.**
United States District Court, Northern District of California
Evaluate economic issues related to class certification including plaintiffs' proposed use of the cost to repair an alleged defect in variable timing control actuators as a measure of benefit of the bargain damages (expert report and deposition).
- **Barry Rebuk, et al. v. Ford Motor Company of Canada, et al.**
Ontario (Canada) Superior Court of Justice
Evaluate whether representations of fuel consumption ratings based on an older 2-cycle Testing Method resulted in overcharges for Ford vehicles sold in Canada (expert reports and cross examination).
- **Ronald Garcia, et al. v. Harley Davidson Motor Company Group, LLC**
United States District Court, Northern District of California
Evaluate economic issues related to class certification including plaintiffs' proposed use of the cost to repair an alleged defect in ABS as a measure of benefit of the bargain damages (expert report and deposition).
- **Biljana Capic, et al. v. Ford Motor Company of Australia Limited**
Federal Court of Australia, District Registry: New South Wales
Evaluate the plaintiffs' method of calculating excess depreciation, diminution in value at the point of initial purchase and other harm resulting from allegedly defective transmissions in certain Ford vehicles (expert reports and testimony at trial).

- **Shawn Alger, et al. v. FCA US LLC**
United States District Court, Eastern District of California
Evaluate plaintiffs' proposed use of replacement cost as a measure of classwide damages caused by allegedly defective active head restraint systems (expert report and deposition).
- **In re: FCA US LLC Monostable Electronic Gearshift Litigation**
United States District Court, Eastern District of Michigan, Southern Division
Analyze used car prices for evidence of diminution of value resulting from alleged defects in electronic gearshifts (expert reports and depositions).
- **Tom Kondash, et al. v. Kia Motors America and Kia Motors Corp.**
United States District Court, Southern District of Ohio
Evaluate the plaintiffs' proposed method of calculating class-wide damages resulting from alleged defects in panoramic sunroofs (expert report and deposition).
- **Billy Glenn, et al. v. Hyundai Motor America, et al.**
United States District Court, Central District of California
Evaluate the plaintiffs' proposed method of calculating class-wide damages and conduct a statistical analysis of the fracture rates of conventional and panoramic sunroofs (expert report and deposition).
- **Margie Daniel, et al. v. Ford Motor Company**
United States District Court, Eastern District of California
Evaluate repair costs for fleet vehicles for evidence of excess tire wear and review prices of used car transactions for evidence of excess depreciation in the Ford Focus (expert report, deposition and testimony at trial).

PAPERS AND PRESENTATIONS

“Product Liability Litigation Involving Pharmaceuticals and Medical Devices: How Has It Changed in the Big Data/Social Media Era?” Law and Economics Symposium, MIT Sloan, Samberg Center, May 6 2019, Cambridge, MA.

“Using Cash Flows Versus Accrual Net Income,” (co-author), *Calculation of Lost Profits Damages – Theory and Practice*, 1st ed., Everett and Kinrich, eds., Valuation Products and Services LLC, 2017.

“Competition in Title Insurance Markets Since the Great Recession,” presented at the National Conference of Insurance Legislators, Summer Meeting, July 11, 2013, Philadelphia, PA.

“Use The Right Model For Auto Defect Suits,” Law360, July 09, 2013.

“Class Certification and Damages Theories: Consumers’ Valuation of Un-priced Product Attributes,” presented at a Webinar continuing legal education forum sponsored by Ballard Spahr, May 16, 2012.

“Statistical Analyses in Proactive Audits and Employment Litigation,” presented at a Webinar continuing legal education forum for attorneys sponsored by Analysis Group, Inc. May 20, 2009.

“The Subprime Mortgage Crisis and Disclosures: What Went Wrong?” presented at a Webinar continuing legal education forum for attorneys sponsored by Analysis Group, Inc., July 29, 2008

“The Subprime Mortgage Crisis and Disclosures: What Went Wrong?” presented at a continuing education forum for attorneys sponsored by Analysis Group, Inc., June 24, 2008, San Francisco, CA.

“Subprime Litigation: A Survival Guide,” presented at Institutional Investor Legal Forum Summer Roundtable, June 18, 2008, Santa Monica, CA.

“Subprime Lending Litigation,” Program Co-chair at a continuing education forum for attorneys sponsored by CLE International, May 8 and 9, 2008, Los Angeles, CA.

“Reductions in Force: Strategies to Minimize Litigation Risk in Downsizing,” presented at a continuing education forum for attorneys sponsored by K&L Gates, January 17, 2008, New York, NY.

“Investigation of Racial Profiling by the LAPD – Pedestrian and Motor Vehicle Post-Stop Data Analysis Report,” City of Los Angeles, July 2006.

“An Assessment of Competition in California Title Insurance and Escrow Markets,” with Bruce Stangle, report prepared for First American Title Insurance Company, August 30, 2006.

“Evaluation of Proposed Regulations for the California Title Insurance and Escrow Industry,” with Bruce Stangle, report prepared for First American Title Insurance Company, August 30, 2006.

“Competition and Title Insurance Rates in California,” with Bruce Stangle, report prepared for First American Title Insurance Company, January 23, 2006.

“Competition and Title Insurance Prices in California,” report and presentation to the National Association of Insurance Commissioners (NAIC), Title Insurance Working Group, June 2006, Washington DC.

“Switching Cost, Price Sensitivity and Health Plan Choice,” *Journal of Health Economics* 21, January 2002, p. 89-116.

“Risk Selection Caused by the Correlation of Health Status and Sensitivity to Price,” Research in Health Care Financial Management Symposium, August 2001, Best Research Paper Award.

Appendix B Documents Relied Upon

Declarations

Amended Declaration of Jonathan Griglack, May 23, 2022

Declaration of Allan I. Schwartz, April 7, 2022

Declaration of Jonathan Griglack, October 12, 2022

Declaration of Quinn Saner, May 27, 2022

Legal Filings

Plaintiffs' Notice of Motion and Motion for Class Certification, *Eileen-Gayle Coleman, and Robert Castro, on behalf of themselves and all others similarly situated, v. United Services Automobile Association and USAA General Indemnity Company*, Case No. 3:21-cv-00217-CAB-LL, April 8, 2022

Plaintiffs' Motion to Amend Proposed Class Definitions, *Eileen-Gayle Coleman, and Robert Castro, on behalf of themselves and all others similarly situated, v. United Services Automobile Association and USAA General Indemnity Company*, Case No. 21-cv-00217-RSH-KSC, October 12, 2022

Depositions

Deposition of Jonathan Griglack, May 16, 2022

Other Documents

Payment History - Coleman, Castro.xlsx

Publicly-Available Documents

Allen, Mark A., et al., "Reference Guide on Estimation of Economic Damages," *Reference Manual on Scientific Evidence*, 3rd Ed., 2011, Washington, D.C.: National Academies Press

Evans, Elizabeth A., et al., "Damages Theories and Causation Issues," *Litigation Services Handbook*, 2017, John Wiley & Sons

EXHIBIT E1

Exhibit 1
Summary of Policy Adjustments for the Named Plaintiffs

April 1 and October 1, 2017–2021

Premium Date	E. Coleman					R. Castro				
	Initial Premium ^[1]	Paid Premium	Difference	Percent Difference	Number of Adjustments	Initial Premium ^[1]	Paid Premium	Difference	Percent Difference	Number of Adjustments
April 1, 2017	\$788.56	\$1,425.80	\$637.24	80.8%	2	\$1,188.21	\$1,335.22	\$147.01	12.4%	1
October 1, 2017	\$1,800.52	\$1,800.52	\$0.00	0.0%	0	\$1,501.59	\$1,377.58	-\$124.01	-8.3%	3
April 1, 2018	\$1,466.50	\$1,373.53	-\$92.97	-6.3%	1	\$1,278.90	\$1,190.95	-\$87.95	-6.9%	1
October 1, 2018	\$1,451.87	\$1,451.87	\$0.00	0.0%	0	\$1,244.05	\$1,234.47	-\$9.58	-0.8%	3
April 1, 2019	\$1,438.55	\$1,438.55	\$0.00	0.0%	0	\$1,276.76	\$1,216.68	-\$60.08	-4.7%	1
October 1, 2019	\$1,577.80	\$1,577.80	\$0.00	0.0%	0	\$1,202.89	\$1,311.21	\$108.32	9.0%	1
April 1, 2020 ^[2]	\$1,569.13	\$1,548.11	-\$21.02	-1.3%	1	\$1,626.87	\$1,626.87	\$0.00	0.0%	0
October 1, 2020	\$1,427.03	\$1,487.52	\$60.49	4.2%	2	\$1,431.54	\$1,431.54	\$0.00	0.0%	0
April 1, 2021 ^[3]	\$1,674.78	\$1,637.18	-\$37.60	-2.2%	2	\$720.46	\$1,724.33	\$1,003.87	139.3%	3
October 1, 2021	N/A	N/A	N/A	N/A	N/A	\$1,738.86	\$1,738.86	\$0.00	0.0%	0
Total	\$13,194.74	\$13,740.88	\$546.14	4.1%	8	\$13,210.13	\$14,187.71	\$977.58	7.4%	13
Number of Periods with Adjustments					5					7

Notes:

[1] Initial Premium reflects the premium as of the effective date of the policy. Any policy adjustments that occur prior to or on the effective date are included in Initial Premium and are not counted as adjustments.

[2] In the policy period encompassing April 1, 2020, USAA issued refunds associated with the COVID-19 pandemic. In this analysis, those refunds are added to the Paid Premium so that any difference between the Estimated Premium and Paid Premium reflect only policy adjustments.

[3] Named Plaintiff Coleman cancelled their policy on September 8, 2021, after their entire premium had been paid off. The values here reflect payments and adjustments prior to the cancellation. Both Named Plaintiffs received "Credit Transfers" during this policy period. The value of those transfers is added to the Paid Premium so that any difference between the Initial Premium and Paid Premium reflect only policy adjustments.

Sources:

Payment History - Coleman, Castro.xlsx

EXHIBIT F

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

EILEEN-GAYLE COLEMAN,
and ROBERT CASTRO, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

UNITED SERVICES
AUTOMOBILE ASSOCIATION
and USAA GENERAL
INDEMNITY COMPANY,

Defendants.

Case No. 3:21-cv-00217-RSH-KSC

REBUTTAL EXPERT REPORT OF BRUCE A. STROMBOM, PH.D.

December 2, 2022

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I. INTRODUCTION

A. Qualifications

1. I previously submitted an expert report in this matter on October 17, 2022.¹ That report includes information on my qualifications, prior testimony and compensation.

B. Assignment

2. I have been retained by counsel for United Services Automobile Association (“United Services”) and USAA General Indemnity Company (“GIC”) (collectively, “USAA”) to, among other things, provide expert testimony on the issues of injury and damages in this matter. Specifically, I have been asked to provide a rebuttal to certain opinions in the Expert Report of Jonathan Griglack, dated October 17, 2022 (the “Griglack Report”).² I have previously submitted a declaration and supplemental declaration in this matter addressing economic issues related to class certification and an expert report addressing issues related to damages.³

C. Documents Relied Upon

3. For this report, I and staff under my supervision have reviewed court documents as well as other materials provided through discovery in this case or obtained from public sources. The documents, materials and other information I have relied upon in conducting my analysis and in forming my opinions are listed in this report and/or in **Appendix A**.

4. My analysis and conclusions to date are based on the information available when this report was submitted. I reserve the right to amend my report and may modify, refine, or revise my opinions if new information is identified or otherwise becomes available.

¹ Expert Report of Bruce A. Strombom, October 17, 2022.

² I note that Plaintiffs’ damages expert, Allan I. Schwartz, also submitted a report in this matter on October 17, 2022. Mr. Schwartz’s opinions rely primarily on the analysis conducted by Mr. Griglack. Thus, many of my criticisms of the Griglack Report would apply equally to Mr. Schwartz’s report.

³ Declaration of Bruce A. Strombom, June 2, 2022; Supplemental Declaration of Bruce A. Strombom, July 1, 2022; Expert Report of Bruce A. Strombom, October 17, 2022.

D. Summary of Opinions

5. The following is a summary of my opinions:

- Mr. Griglack’s analysis is fundamentally flawed because it fails to consider that Plaintiffs’ theory of liability would require changes to the existing GIC and United Services rates and rating system—*e.g.*, combining GIC policyholders and United Services policyholders into a single risk pool (to address the theory that it is unfairly discriminatory to charge different auto insurance rates to enlisted personnel and officers), or moving a substantial number of GIC policyholders into United Services (to address the theory that it is unfair or unlawful not to offer all statutory “good drivers” a policy from United Services). These changes would cause premiums in the but-for world to exceed the premiums United Services actually charged.
- Mr. Griglack’s analysis, which is based on eight snapshots as of March 31 and September 30 for the years 2018 to 2021, does not calculate the amount of premium GIC policyholders actually paid. Thus, it also cannot be used to calculate what their United Services premium would have been—or the difference between the two, *i.e.*, the fact and amount of damages for any GIC policyholder—even ignoring Mr. Griglack’s failure to consider how a changed risk pool would have affected but-for premiums.
 - Mr. Griglack’s analysis is flawed because it does not address, let alone account for, the many material, individualized changes in rating characteristics of members of the proposed class that cause premiums to change in between the eight snapshot dates, and during policyholders’ six-month policy periods.
 - To the extent that premiums change during the coverage period, the total premium actually paid by policyholders will differ from the premiums calculated by Mr. Griglack as of the snapshot dates.
 - Nine of the Named Plaintiffs’ 15 six-month policies (60 percent) had at least one policy adjustment that affected the policy premium during the policy period such that the initial premium (*i.e.*, the premium as of the effective date of the policy) was *not* equal to the total premium actually paid by the policyholder.
 - In addition to failing to account for changes in rating characteristics of the policyholders, Mr. Griglack’s analysis also does not account for intra-period policy cancellations, which occurred for 14.5 percent of the sample policies I analyzed.
- Mr. Griglack’s estimates of damages are flawed and unreliable in light of his failure to account for changes in rating characteristics and intra-period policy cancellations and his inability to calculate what GIC policyholders actually paid or what their United Services premiums would have been.

II. OVERVIEW OF MR. GRIGLACK'S ANALYSIS

6. The Griglack Report purports to “compare the premiums that GIC charged policyholders to those premiums that would have been charged under USAA....”⁴ Mr. Griglack conducts his analysis as of eight snapshot dates, March 31st and September 30th from 2018 through 2021.⁵ Based on his analysis, Mr. Griglack concludes that “[o]n a total basis, about 97.1% of policyholders with collision coverage, about 97.0% of policyholders with collision coverage and good driver discount, and about 93.8% of all policyholders paid more in GIC than they would have paid in USAA.”⁶ He further concludes that “[t]he difference between the amount that policyholders in GIC with collision coverage paid and what they would have paid in USAA is \$169.4 million [and] [t]he difference between the amount that policyholders in GIC with collision coverage who qualified for a good driver discount paid and what they would have paid in USAA is \$149.6 million.”⁷

III. CRITIQUE OF MR. GRIGLACK'S ANALYSIS

A. Mr. Griglack's Analysis Fails to Consider That Addressing Plaintiffs' Theory of Liability Would Cause But-for Premiums to Differ From the Premiums United Services Actually Charged

7. Mr. Griglack's analysis is fundamentally flawed because it fails to consider that in a but-for world in which both GIC policyholders and United Services policyholders are charged the same rates and relativities—that is, the but-for world needed to address Plaintiffs' theory of discrimination liability—those rates would, on average, be higher than the actual rates charged by United Services. Charging both sets of policyholders identical rates and relativities is economically equivalent to combining these policyholders into a single risk pool. Combining GIC policyholders and United Services policyholders into a single risk pool would cause but-for premiums to differ from the premiums United Services actually charged.

⁴ Griglack Report, ¶ 4.

⁵ Griglack Report, ¶¶ 4-5.

⁶ Griglack Report, ¶ 9.

⁷ Griglack Report, ¶ 10.

8. Alternatively, to the extent that Plaintiffs’ “good driver” claim requires only that those GIC policyholders who qualify as statutory good drivers be charged the United Services rates and relativities, Mr. Griglack’s analysis fails to account for the fact that adding a substantial number of GIC policyholders (the statutory good drivers) to United Services would require changes to the existing United Services rates and relativities. In that scenario, the but-for rates and relativities of United Services would differ from the existing United Services rates and relativities in the actual world.

9. While Mr. Griglack’s analysis assumes that but-for premiums for GIC policyholders would have been equal to the actual premiums charged to otherwise identical United Services policyholders, he does not provide any economic justification for this assumption. Plaintiffs’ theories of liability imply that GIC policyholders and United Services policyholders would have been combined into a single risk pool in the but-for world, or at least that a substantial number of GIC policyholders (the statutory good drivers) would have been added to the United Services risk pool. However, if the GIC and United Services risk pools had been combined (in whole or in substantial part) and the experience of both GIC and United Services policyholders had been considered in determining a common rate schedule, then the but-for rate schedule would not have been equal to United Services’ actual rate schedule.⁸ I understand that it is undisputed that the current GIC rates are (on average) higher than the current United Services rates. In my opinion, it is reasonable to assume that the rates for a combined GIC and United Services risk pool would be higher than the current United Services rates, because the current United Services rates would need to increase to account for the higher (on average) risks presented by the GIC policyholders.

10. The failure of Mr. Griglack to account for how a combined risk pool would have affected but-for premiums is a fundamental flaw that results in economically unsound and unreliable conclusions. This error will cause but-for premiums for GIC policyholders to be understated, cause the number of GIC policyholders who were injured and the number of proposed class members to be overstated (because I understand that Plaintiffs have tethered the class definition to the existence of injury), and cause damages to the proposed class to be

⁸ Declaration of Quinn Saner, May 27, 2022 (“Saner Declaration”), ¶ 57.

overstated, resulting in a windfall to Plaintiffs by placing them in a better economic position than they would have been in absent the alleged misconduct.

B. Mr. Griglack’s Analysis Remains Unreliable Because it is Incapable of Calculating Either the Premium that GIC Policyholders Actually Paid or the Premium They Would Have Paid Based on United Services’ Actual Rates

11. As I discussed in my prior declaration, Mr. Griglack’s analysis is flawed because it does not address, let alone account for, the many material, individualized changes in rating characteristics of the policyholders (*e.g.*, adding or removing a vehicle, adding or removing an optional coverage, adding or removing a driver, changing coverage limits or deductibles, changing the “principally garaged” location, changing the estimate of annual miles driven, or recognizing a change in marital status⁹) that cause premiums to change in between the eight snapshot dates, and during policyholders’ six-month policy periods. To the extent that premiums change during the coverage period, the total premium actually paid by proposed class members will differ from the premiums calculated by Mr. Griglack as of the snapshot dates.

12. To provide evidence of the prevalence of the flaws in Mr. Griglack’s analysis, I have reviewed histories of the premiums paid by the Named Plaintiffs in this matter from 2018 to 2021 to determine how often the premiums changed during the coverage period. My review of the Named Plaintiffs’ policies shows that policy adjustments occur frequently during the periods when policies were in effect and that the magnitude of the premium changes associated with policy adjustments is often material. For example:

- a) Approximately 60 percent of the Named Plaintiffs’ policies (9 of 15 policies) had at least one policy adjustment that affected the policy premium during the six-month policy period so that the initial premium (*i.e.*, the premium as of the effective date of the policy) was *not* equal to the total premium actually paid by the policyholder.
- b) For the 60 percent of the Named Plaintiffs’ policies for which there was at least one policy adjustment during the policy period:
 - i. Policy adjustments occurred an average of 1.67 times during the six-month policy period: five policies had one adjustment, two

⁹ Saner Declaration, ¶ 41.

policies had two adjustments, and two policies had three adjustments. **See Exhibit 1.**

- ii. The differences between initial premiums and premiums actually paid ranged from negative 6.9 percent to 139.3 percent. **See Exhibit 1.**
- iii. For 44 percent of the Named Plaintiffs' policies (4 of 9 policies), the difference between the initial premium and amount actually paid was more than five percent. **See Exhibit 1.**
- iv. For 11 percent of the Named Plaintiffs' policies (1 of 9 policies), the difference between the initial premium and the amount actually paid was more than 10 percent. **See Exhibit 1.**
- v. For 22 percent of the Named Plaintiffs' policies (2 of 9 policies), the difference between the initial premium and the amount actually paid was more than \$100, including one policy for Mr. Castro for which the difference was \$1,003.87. **See Exhibit 1.**

13. In addition to failing to account for changes in rating characteristics of the policyholders, Mr. Griglack also does not account for intra-period policy cancellations. For example, if a policy was cancelled prior to the end of the six-month policy period, but after Mr. Griglack's snapshot date, Mr. Griglack's analysis would be inaccurate and would tend to overestimate the GIC premium.

14. To evaluate the potential impact of Mr. Griglack's failure to account for changes in rating characteristics *and* intra-period policy cancellations, I selected a simple random sample from among the policies analyzed by Mr. Griglack. I selected 400¹⁰ policies that were in effect during the time period that Mr. Griglack analyzed. For this random sample of policies, I was provided with information on the policyholders' total actual GIC premium amounts as well as information on the cancellation date for those policies that were cancelled. Of the 400 sample policies, 58 policies (14.5 percent) had intra-period policy cancellations.

15. I analyzed this sample of policies to determine how accurately Mr. Griglack was able to calculate the amount of premiums actually paid by GIC policyholders. My analysis

¹⁰ In order to create the random sample of 400 policies, I imported a list of all policy numbers analyzed by Mr. Griglack into SAS and generated a random number between 0 and 1 to be associated with each policy number. I then sorted the policies by the generated random number in descending order and identified the first 450 policies. Of those 450 policies, I selected the first 400 policies that were rated by Mr. Griglack.

shows that Mr. Griglack's methodology remains incapable of accurately calculating actual GIC premiums. For example:

- a) Across all snapshot dates, the average difference (absolute value) between Mr. Griglack's calculated GIC premium and the actual premium paid by policyholders in the sample ranged from \$72.90 to \$102.50. On a percentage basis, the difference ranged from 6.9 percent to 10.4 percent of the total premium. **See Exhibit 2.**
- b) Across all snapshot dates, the average difference (net) between Mr. Griglack's calculated GIC premium and the actual premium paid by policyholders in the sample ranged from negative \$27.01 to \$11.89. On a percentage basis, the difference ranged from negative 2.4 percent to 1.3 percent of the total premium. **See Exhibit 2.**

16. Mr. Griglack attempts to address changes in rating characteristics by stating “[g]iven the consistency of the results across periods, we conclude that it is very unlikely that any policy changes that occurred between the eight sample dates that were not accounted for in the next spreadsheet would significantly impact the results of comparing GIC premium to USAA premium.”¹¹ However, Mr. Griglack fails to account for changes in rating characteristics that affect GIC premiums and USAA premiums differently. Mr. Griglack's calculation of damages is incorrect when a change in rating factor that causes the intra-policy premium change involves rating factors for which the relativities differ between United Services and GIC. In his report, Mr. Griglack identifies eight rating factors that he concedes have different relativities between United Services and GIC: 1) pure premium band; 2) increased limit factors (BI/PD); 3) premier operator discount; 4) years of driving experience; 5) conviction surcharges; 6) accident surcharges; 7) annual mileage; and 8) other misc. vehicles.¹² To the extent that any of these factors for which the pertinent relativities differ changed during the policy period, Mr. Griglack's calculation of the difference between the GIC premium and United Services premium (*i.e.*, his estimate of damages) would be incorrect.¹³

¹¹ Griglack Report, ¶ 48.

¹² Griglack Report, ¶ 19.

¹³ I understand that the intra-policy changes in premium for named plaintiff Robert Castro involved two of these seven rating factors: 1) change in pure premium band caused by a change of the principally garaged location of his vehicles, and 2) increase in the annual mileage for his vehicles.

17. Based on the analysis discussed above, Mr. Griglack's estimates of damages are flawed and unreliable in light of the error rate and magnitude of errors for the Named Plaintiffs' policies and sample policies. If Mr. Griglack is unable to calculate what GIC policyholders actually paid, as the analysis above demonstrates, then he cannot calculate what their United Services premium would have been, even ignoring his failure to consider how a combined risk pool would have affected but-for premiums.

A handwritten signature in black ink, appearing to read "Bruce A. Strombom", is written over a solid horizontal line.

Bruce A. Strombom

Appendix A

Documents Relied Upon

Expert Reports and Declarations

Expert Report of Jonathan Griglack, October 17, 2022 and Appendices
Declaration of Quinn Saner, May 27, 2022

Other Documents

Payment History - Coleman, Castro.xlsx
PR_23145_COLEMAN CLASS ACTION.xlsx
Copy of List of Terminated Policies in Sample_for USAA (005).xlsx

EXHIBIT F1

Exhibit 1
Summary of Policy Adjustments for the Named Plaintiffs

March 31 and September 30, 2018–2021

Premium Date	E. Coleman					R. Castro					
	Initial Premium ^[1]	Paid Premium	Difference	Percent Difference	Number of Adjustments	Initial Premium ^[1]	Paid Premium	Difference	Percent Difference	Number of Adjustments	
March 31, 2018	\$1,466.50	\$1,373.53	-\$92.97	-6.3%	1	\$1,278.90	\$1,190.95	-\$87.95	-6.9%	1	
September 30, 2018	\$1,451.87	\$1,451.87	\$0.00	0.0%	0	\$1,244.05	\$1,234.47	-\$9.58	-0.8%	3	
March 31, 2019	\$1,438.55	\$1,438.55	\$0.00	0.0%	0	\$1,276.76	\$1,216.68	-\$60.08	-4.7%	1	
September 30, 2019	\$1,577.80	\$1,577.80	\$0.00	0.0%	0	\$1,202.89	\$1,311.21	\$108.32	9.0%	1	
March 31, 2020 ^[2]	\$1,569.13	\$1,548.11	-\$21.02	-1.3%	1	\$1,626.87	\$1,626.87	\$0.00	0.0%	0	
September 30, 2020	\$1,427.03	\$1,487.52	\$60.49	4.2%	2	\$1,431.54	\$1,431.54	\$0.00	0.0%	0	
March 31, 2021 ^[3]	\$1,674.78	\$1,637.18	-\$37.60	-2.2%	2	\$720.46	\$1,724.33	\$1,003.87	139.3%	3	
September 30, 2021	N/A	N/A	N/A	N/A	N/A	\$1,738.86	\$1,738.86	\$0.00	0.0%	0	
Total	\$10,605.66	\$10,514.56	-\$91.10	-0.9%	6	\$10,520.33	\$11,474.91	\$954.58	9.1%	9	
Number of Periods with Adjustments						4					5

Notes:

[1] Initial Premium reflects the premium as of the effective date of the policy. Any policy adjustments that occur prior to or on the effective date are included in Initial Premium and are not counted as adjustments.

[2] In the policy period encompassing April 1, 2020, USAA issued refunds associated with the COVID-19 pandemic. In this analysis, those refunds are added to the Paid Premium so that any difference between the Estimated Premium and Paid Premium reflect only policy adjustments.

[3] Named Plaintiff Coleman cancelled their policy on September 8, 2021, after their entire premium had been paid off. The values here reflect payments and adjustments prior to the cancellation. Both Named Plaintiffs received "Credit Transfers" during this policy period. The value of those transfers is added to the Paid Premium so that any difference between the Initial Premium and Paid Premium reflect only policy adjustments.

Sources:

Payment History - Coleman, Castro.xlsx

EXHIBIT F2

Exhibit 2
Actual Premium v. Mr. Griglack's Estimate
For 400 Sample Policies

	Snapshot Date								Grand Total
	3/31/2018	9/30/2018	3/31/2019	9/30/2019	3/31/2020	9/30/2020	3/31/2021	9/30/2021	
Number of Policies Compared	128	241	246	254	270	273	270	260	400
Total Difference (Absolute Value)	\$12,544.96	\$21,956.66	\$17,955.40	\$21,708.53	\$24,191.29	\$19,900.41	\$27,673.67	\$26,292.50	\$172,223.42
Average Difference per Policy (Absolute Value)	\$98.01	\$91.11	\$72.99	\$85.47	\$89.60	\$72.90	\$102.50	\$101.13	\$430.56
Percentage Difference (Absolute Value) ^[2]	10.4%	9.7%	7.3%	8.5%	8.5%	6.9%	9.2%	9.0%	8.6%
Net Total Difference (Estimate - Actual)	-\$1,423.30	\$2,864.92	-\$5,654.30	-\$3,823.03	-\$445.23	-\$3,669.97	-\$7,293.67	-\$4,570.56	-\$24,015.14
Average Difference per Policy (Net)	-\$11.12	\$11.89	-\$22.98	-\$15.05	-\$1.65	-\$13.44	-\$27.01	-\$17.58	-\$60.04
Percentage Difference (Net) ^[3]	-1.2%	1.3%	-2.3%	-1.5%	-0.2%	-1.3%	-2.4%	-1.6%	-1.2%

Notes:

[1] Absolute values reflect the non-negative value regardless of the value's sign. For example, for two policies with a difference of +\$20 and -\$20, the Net Total Difference would be zero, but the Total Difference (Absolute Value) would be 40.

[2] Percentage Difference (Absolute Value) reflects the Total Difference (Absolute Value) divided by the total value of actual premiums paid.

[3] Percentage Difference (Net) reflects the Net Total Difference divided by the total value of actual premiums paid.

Sources:

PR_23145_COLEMAN CLASS ACTION.xlsx; Griglack Report Appendices C-5 through C-12.

EXHIBIT G

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

EILEEN-GAYLE COLEMAN,
and ROBERT CASTRO, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

Case No. 3:21-cv-00217-RSH-KSC

UNITED SERVICES
AUTOMOBILE ASSOCIATION
and USAA GENERAL
INDEMNITY COMPANY,

Defendants.

**REBUTTAL EXPERT REPORT SUPPLEMENT OF BRUCE A.
STROMBOM, PH.D.**

March 10, 2023

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I. Background and Description of the Data Issue..... 1

II. Resolution of the Data Issue..... 1

III. Update to Paragraph 15 of My Rebuttal Report 2

I. BACKGROUND AND DESCRIPTION OF THE DATA ISSUE

1. I previously submitted a rebuttal expert report in this matter on December 2, 2022 (“Rebuttal Report”),¹ and gave a deposition on January 17, 2023. During my deposition, I became aware of a potential issue with a data file I relied upon (PR_23145_COLEMAN CLASS ACTION.xlsx), which contained information on policyholders’ total actual GIC premium amounts. More specifically, based on questions I was asked by Plaintiffs’ counsel during my deposition,² it came to my attention that the file PR_23145_COLEMAN CLASS ACTION.xlsx may have included information for additional policies that were not reflected in the eight spreadsheets generated by USAA and thus not relied upon by Mr. Griglack.

II. RESOLUTION OF THE DATA ISSUE

2. Based on its review of PR_23145_COLEMAN CLASS ACTION.xlsx, USAA determined that the file inadvertently included information for non-California policies that were not relevant to this litigation and consequently not included in the USAA-generated spreadsheets provided to Mr. Griglack. USAA then provided me with an updated file (PR_23145_COLEMAN CLASS ACTION - base state updated.xlsx) that identified the corresponding state for each policy.

3. Consistent with the initial version of this file, PR_23145_COLEMAN CLASS ACTION - base state updated.xlsx contained data in two formats: BASE data and CAS data. The BASE data in the updated file are identical to the BASE data in the initial version but include an additional variable that identifies the “Base State.” The CAS data in the updated file include a variable that identifies “Base State,” but this variable is provided for only one observation per policy. As a result, it was necessary to append the relevant “Base State” value for each policy to the original CAS data in order to have a complete database with “Base State” information for all observations.

¹ Rebuttal Expert Report of Bruce A. Strombom, Ph.D., December 2, 2022.

² Deposition of Bruce A. Strombom, Ph.D., January 17, 2023, pp. 155-167.


4. After completing those steps, I excluded all non-California policies (*i.e.*, all policies for which “Base State” values were not “CA”) and re-ran the analysis I performed in my Rebuttal Report.³ The results of my updated analysis are summarized in **Updated Exhibit 2**.

III. UPDATE TO PARAGRAPH 15 OF MY REBUTTAL REPORT

5. As a result of the revised analysis discussed above, it is necessary for me to also update paragraph 15 of my Rebuttal Report. However, the updates to paragraph 15 and Exhibit 2 do not change the overall opinions or conclusions I reached in my Rebuttal Report. Paragraph 15 should now read as follows:

15. I analyzed this sample of policies to determine how accurately Mr. Griglack was able to calculate the amount of premiums actually paid by GIC policyholders. My analysis shows that Mr. Griglack’s methodology remains incapable of accurately calculating actual GIC premiums. For example:

- a) Across all snapshot dates, the average difference (absolute value) between Mr. Griglack’s calculated GIC premium and the actual premium paid by policyholders in the sample ranged from \$42.63 to \$79.81. On a percentage basis, the difference ranged from 4.4 percent to 8.7 percent of the total premium. **See Updated Exhibit 2.**
- b) Across all snapshot dates, the average difference (net) between Mr. Griglack’s calculated GIC premium and the actual premium paid by policyholders in the sample ranged from \$10.80 to \$42.99. On a percentage basis, the difference ranged from 1.2 percent to 4.7 percent of the total premium. **See Updated Exhibit 2.**



Bruce A. Strombom

³ In order to be consistent with Mr. Griglack’s analysis, I also excluded any policies prior to December 28, 2017.

EXHIBIT G1

Updated Exhibit 2
Actual Premium v. Mr. Griglack's Estimate
For 400 Sample Policyholders

	Snapshot Date								Grand Total
	3/31/2018	9/30/2018	3/31/2019	9/30/2019	3/31/2020	9/30/2020	3/31/2021	9/30/2021	
Number of Policyholders Compared	128	241	246	254	270	273	270	260	400
Total Difference (Absolute Value)	\$10,215.91	\$16,016.45	\$10,487.33	\$15,825.14	\$17,793.28	\$12,450.78	\$15,518.87	\$19,011.80	\$117,319.56
Average Difference per Policyholder (Absolute Value)	\$79.81	\$66.46	\$42.63	\$62.30	\$65.90	\$45.61	\$57.48	\$73.12	\$293.30
Percentage Difference (Absolute Value) ^[2]	8.7%	7.3%	4.4%	6.4%	6.5%	4.5%	5.4%	6.8%	6.1%
Net Total Difference (Estimate - Actual)	\$1,381.97	\$10,359.43	\$4,576.15	\$4,913.62	\$9,316.20	\$5,639.22	\$6,846.29	\$5,301.58	\$48,334.46
Average Difference per Policyholder (Net)	\$10.80	\$42.99	\$18.60	\$19.34	\$34.50	\$20.66	\$25.36	\$20.39	\$120.84
Percentage Difference (Net) ^[3]	1.2%	4.7%	1.9%	2.0%	3.4%	2.0%	2.4%	1.9%	2.5%

Notes:

[1] Absolute values reflect the non-negative value regardless of the value's sign. For example, for two policies with a difference of +\$20 and -\$20, the Net Total Difference would be zero, but the Total Difference (Absolute Value) would be 40.

[2] Percentage Difference (Absolute Value) reflects the Total Difference (Absolute Value) divided by the total value of actual premiums paid.

[3] Percentage Difference (Net) reflects the Net Total Difference divided by the total value of actual premiums paid.

Sources:

PR_23145_COLEMAN CLASS ACTION.xlsx; PR_23145_COLEMAN CLASS ACTION - base state updated.xlsx; Griglack Report Appendices C-5 through C-12.

EXHIBIT H

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

EILEEN-GAYLE COLEMAN
and ROBERT CASTRO, on behalf
of themselves and all others
similarly situated,

Plaintiffs,

vs.

Case No. :
3:21-CV-00217-RSH-KSC

UNITED SERVICES AUTOMOBILE
ASSOCIATION and USAA GENERAL
INDEMNITY COMPANY,
Defendants.

VIDEO-RECORDED REMOTE VIDEOCONFERENCE DEPOSITION OF
EXPERT JONATHAN GRIGLACK
Wednesday, January 11, 2023

Reported by: Michelle Bulkley, CSR #13658
Job #5620745; Pages 1 - 247

1 trying to have your model come up with a calculated 12:12
2 GIC premium that is the same as the given GIC
3 premium from USAA?

4 A Yeah. That generally describes what we
5 were trying to do. 12:12

6 Q Okay. And you say in paragraph 2 of
7 Exhibit 112 that you could not do that; correct?

8 A Yeah. I believe a more accurate statement
9 would have been we could not fully replicate or we
10 could not accurately replicate all the premiums, 12:12
11 because we were able to replicate, even back then, a
12 majority of [inaudible].

13 (Reporter clarification.)

14 THE WITNESS: Vehicles.

15 BY MR. SCOLNICK: 12:13

16 Q So I'm going to ask you about the GIC
17 stated premiums. What do you understand that number
18 to represent?

19 A By GIC stated premiums, you're referring
20 to the given -- the given premiums in the files? 12:13

21 Q I'm sorry. Yes. The GIC given premiums.

22 A So what does that represent? To my
23 understanding, is that that represented the premium
24 for that GIC policyholder or that vehicle underneath
25 the GIC policy at that sample date. 12:13

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1 into a model similar to what we have done, and that 12:22
2 premium was being generated.

3 Q Do you know whether the given GIC premium
4 that appears in the spreadsheets from USAA is the
5 same as what any specific policyholder was actually 12:22
6 charged for that period?

7 A Sorry. Could you repeat that?

8 Q Sure.

9 I'm wondering if you have any idea whether
10 the given GIC premium for any policyholder, for any 12:22
11 sample date, is the same as what that policyholder
12 actually paid for insurance for the period that
13 included that sample date.

14 A Okay. I understand.

15 There were instances where, yes, that was 12:23
16 true, and I got that from the data that Mr. Strombom
17 provided through his -- I believe it was through his
18 rebuttal, not his expert report. But he did provide
19 data where, yes, there was matching of premiums in
20 that instance, but there are also, of course, 12:23
21 instances where they did not match.

22 Q So sometimes it matches; sometimes it
23 doesn't?

24 A Yeah. That's a fair statement.

25 Q And we talked already that USAA had 12:23

1 somewhere. So we would need that transactional 12:24
2 data.

3 Q Let's just go with a specific example. So
4 I have a policyholder. We'll call him
5 policyholder A. And the given GIC premium on 12:25
6 March 31, 2019 is \$500.

7 What would you need -- what specific
8 information would you need to know whether that \$500
9 in given GIC premium was what the policyholder
10 actually paid for his policy that included the -- 12:25
11 the six-month policy that included March 31, 2019?

12 A In that example, we would need any
13 transactions that took place over that six-month
14 period. And by "six-month" -- sorry. By "that
15 six-month period," I mean from the effective date to 12:26
16 when it ended.

17 Q So in order to -- for -- for -- if you're
18 looking then at the entire population of all of GIC
19 policyholders, wouldn't you need all that
20 transactional data to know whether or not the given 12:26
21 GIC premium is what they actually paid?

22 A Correct. We wouldn't technically need all
23 of it, but we could also look at a sample and see
24 how many would actually have changes throughout a
25 particular period to at least get an estimate. 12:26

1 those to determine the premiums for policyholders in 01:57
2 a different company?

3 A To my knowledge, no ASOP would have
4 something so specific within it. They're -- they're
5 mostly general standards of practice. So, no, I 01:57
6 couldn't think of anything that would have that.

7 Q Well, apart from the Actuarial Standards
8 of Practice, do you believe it would be actuarially
9 appropriate to calculate premiums for policyholders
10 in one company by using the rates and relativities 01:58
11 for a different company?

12 MR. LIEDER: Objection.

13 THE WITNESS: We weren't asked to opine on
14 the actuarial appropriateness of using the base
15 rates from United Services -- sorry -- base rates 01:58
16 and relativities from United Services that calculate
17 premiums from GIC policies. We were just asked to
18 calculate the difference between the two.

19 BY MR. SCOLNICK:

20 Q Well, how about just as an actuary? I'm 01:58
21 asking your view. Would it be actuarially
22 appropriate for, say, GEICO to calculate premiums
23 for its policyholders by looking to the State Farm
24 rates and relativities?

25 MR. LIEDER: Objection. 01:58

1 THE WITNESS: In that example, in all 01:58
2 likelihood, no, unless they had similar experience,
3 which I highly doubt. But there is always that
4 possibility that they do, so -- but highly unlikely.

5 BY MR. SCOLNICK: 01:59

6 Q Well, so replace in that hypothetical --
7 replace GIC with GEICO and United Services with
8 State Farm. Assuming that the experiences of each
9 company is different, would it be actuarially
10 appropriate for GIC to calculate premiums for its 01:59
11 policyholders using the United Services' rates and
12 relativities?

13 MR. LIEDER: Objection.

14 THE WITNESS: To me, those circumstances
15 are different because it's underneath the same 01:59
16 parent company as opposed to two completely
17 different companies, but I don't really have a
18 response to that.

19 BY MR. SCOLNICK:

20 Q Why -- 01:59
21 (Simultaneous speakers.)

22 Q -- is it different that -- sorry.

23 Why is it different that one example is
24 two different companies under one parent and the
25 other example is two different separate companies, 01:59

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1 get the final premium. 02:10

2 Q That was my next question is final
3 premium. Can you just be a little more specific
4 what you mean by "final premium"? What is that
5 number coming up with? 02:10

6 A It is the calculated premium for all the
7 rating characteristics at that point in time for
8 that policy. So if the policy is effective 3/1,
9 what X amount of rating characteristics -- that's
10 what the premium is being calculated for, for that 02:11
11 policy at 3/1.

12 Q And, again, we talked about this, but
13 your -- what you just called final premium is not
14 necessarily the same as what the insurer actually
15 bills for the policy period that includes 3/1; 02:11
16 correct?

17 A Correct.

18 Q And why would there be differences?

19 A As we spoke about before, the differences
20 would be because of transactions that take place 02:11
21 after the effective date. So, again, for instance,
22 changing your limits, dropping a car, moving to a
23 different ZIP Code, things of that nature would
24 change it.

25 Q Could there be a difference between the 02:11

1 amount that an insurer bills for a six-month period 02:11
2 and the amount that a policyholder pays for that
3 same period?

4 A Yeah. That's a possibility.

5 Q How would that play out? 02:12

6 A From personal experience, my insurer
7 actually gives a dividend, so what I'm billed at the
8 end of the day isn't what I'm actually paying. So
9 if you receive a dividend against a premium
10 policy -- sorry -- the policy premium. 02:12

11 Q Okay. How about another example? Is it
12 possible that somebody just might not pay the full
13 amount due for a six-month policy period?

14 A It's a possibility, yeah.

15 Q Have you done any work to determine in 02:12
16 this case whether any of the policyholders you
17 looked at just didn't pay a portion of their
18 premium?

19 A No. I haven't done any work in that
20 regard. 02:13

21 Q Would you be able to make that
22 determination based on the information you have?

23 A Based off of the current information that
24 I have, no.

25 Q What would you need? 02:13

1 calculated GIC premium; it has the same limitation? 02:21

2 A I'm sorry. Wasn't that what you were just
3 asking?

4 Q I was asking about the given GIC premium,
5 how it's not necessarily the same as what somebody 02:21
6 actually pays, and I'm asking whether the same is
7 true for your calculated GIC premium.

8 A Sorry. Understood. Yes, that's correct.

9 Q Okay. Let's go to paragraph 29 of
10 Exhibit 103. And in the first sentence of 02:21
11 paragraph 29, you say in your report:

12 "We replicate the methodology base rates
13 and relativities USAA has set out in its
14 filings with the California Department of
15 Insurance." 02:22

16 Right?

17 A Correct.

18 Q And do you believe you have, in fact,
19 replicated USAA's methodology?

20 A Rating methodology, yes, I believe so. 02:22

21 Q And are you saying that solely based on
22 your comparison between your calculated GIC premium
23 and the given GIC premium?

24 A I mean, that, as well as the fact that we
25 followed exactly what was prescribed in the rate 02:22

1 which you include in your analysis, and the other 03:24
2 one you just don't include.

3 Is that how it works?

4 A In the instance where that second vehicle
5 in your example was one that we could not rate 03:24
6 because of the data defects, we would not include
7 just that vehicle, but we would include the first
8 one to make sure that that person was at least
9 included instead of excluding it completely.

10 Q Okay. So that's what I'm wondering. So 03:24
11 there probably -- or it looks like there are going
12 to be people -- well, let me just ask this: Do you
13 know if there's anybody that you've identified in
14 your results as having paid more for GIC than they
15 would have with United Services -- were there any 03:25
16 such individuals where they had a vehicle excluded
17 from the analysis?

18 A I don't know the answer to that off the
19 top of my head, but I would almost be certain that
20 there would be at least one person where that was 03:25
21 the case, yes.

22 Q Okay. In the next paragraph, paragraph 34
23 of Exhibit 103, you talk about two different types
24 of defects that cause 97 percent of the unratable
25 vehicles. 03:25

1 the at-fault accident rating variable from 8 to 1 03:44
2 and then the premiums -- I'm not sure if it was
3 exactly, but it was well within 1 percent, the
4 premiums matched.

5 Q So what you were trying to do is to match 03:44
6 as closely as possible the given GIC premium; is
7 that right?

8 A Correct.

9 Q How do you know that USAA just didn't give
10 you the wrong given GIC premium for that 03:45
11 policyholder and, in fact, there were eight at-fault
12 accidents?

13 A I don't know that. I was placing reliance
14 on the figures that they provided me.

15 Q What you're saying in paragraph 35A is you 03:45
16 believe that for this policyholder, there should
17 have just been one at-fault accident instead of
18 eight listed in the spreadsheet; right?

19 A Correct.

20 Q Would you be able to confirm one way or 03:45
21 the other -- in one way or the other, I mean,
22 whether it's you got the wrong given premium or
23 whether you've got the wrong number of accidents?
24 Would you be able to just figure that out given the
25 policyholder's records that USAA has? 03:46

1 A If you're referring to if I was given this 03:46
2 particular policyholder's declaration page, which
3 should have that written down, then, yes, I would be
4 able to figure that out.

5 Q Okay. Did you check if this particular 03:46
6 policyholder also had eight at-fault accidents
7 listed on the other sample dates?

8 A Yes, I believe I did.

9 Q And was that the case?

10 A From what I recall, the eight at-fault 03:46
11 accidents did actually drop to one. I forget how
12 many sample dates later, but it did seem to -- I
13 don't know if I -- I don't know if I want to use the
14 term "self-correct," but that's what's coming to
15 mind right now. So it seems like it self-corrected 03:47
16 itself as time went on.

17 Q Is it possible that in those later
18 spreadsheets, it simply -- because of the later
19 date, the three-year look-back didn't apply anymore,
20 and there were just one -- there was just one 03:47
21 accident instead of eight at that point?

22 A That could potentially be the case, yes.

23 Q You said -- tell me if I'm wrong here --
24 roughly a half dozen to a dozen of these errors per
25 spreadsheet, per sample date? 03:47

1 MR. LIEDER: Objection. Misstates. 03:55

2 THE WITNESS: Yeah. Sorry. I should have
3 been more clear.

4 What we had identified was essentially
5 that with these data errors, if we were to keep them 03:55

6 in and not go the route of having to fix each
7 individual one, which we thought would be
8 unreasonable, that there would be some instances,
9 like this one, where if we were to use given GIC
10 premium as opposed to calculated GIC premium when 03:55
11 comparing GIC to United Services, that people would
12 actually be -- would actually have United Services
13 premium greater than given GIC premium as opposed to
14 using calculated.

15 So that -- I'm using this -- we used this 03:55

16 example to say, okay, we think it's reasonable to
17 actually use calculated GIC premium versus given GIC
18 premium to make sure that, okay, even though there
19 are these data defects, we will at least have the
20 appropriate people shown as having GIC greater than 03:56

21 United Services at the end of the day.

22 BY MR. SCOLNICK:

23 Q In this instance, you're using your
24 calculated GIC premium which makes the correction
25 from eight to one for the at-fault accidents; is 03:56

1 is that right? 03:58

2 A Correct.

3 Q And -- but because you used the given GIC

4 premium, which you consider to be inaccurate --

5 well, stop there. 03:58

6 You consider the given GIC premium to be

7 inaccurate because of the number of at-fault

8 accidents; correct?

9 MR. LIEDER: Objection.

10 THE WITNESS: That's not necessarily true. 03:59

11 We didn't believe it to be inaccurate. We used that

12 to recognize that the at-fault accidents were

13 inaccurate.

14 BY MR. SCOLNICK:

15 Q So is it -- am I right, though, that for 03:59

16 this policyholder that you talk about in

17 paragraph 35A who had eight at-fault accidents but

18 you believe it's really one, but you used eight when

19 you calculated your GIC premium? Is that all right?

20 A Correct. 03:59

21 Q So do you believe your calculated GIC

22 premium is accurate for this policyholder that you

23 give the example in paragraph 35A?

24 A It's accurate with us relying upon the

25 data as is, yes. 03:59

1 Q But you believe the data is wrong? 03:59

2 A I believe, in all likelihood, that this

3 particular instance, there is a data defect, yes.

4 Q Does that mean, in all particular

5 likelihood, in this particular instances -- 04:00

6 instance, that this calculation of GIC premium is

7 wrong?

8 A Yeah. I guess you could say that.

9 Q Go to paragraph 35B, which is the other

10 example you give. Paragraph B -- 35B, we're talking 04:00

11 about conviction points; correct?

12 A Correct.

13 Q What are conviction points?

14 A As I understand it, they are points for

15 infraction such as speeding or reckless driving. 04:00

16 Q And what is the number range? From one to

17 eight or zero to eight?

18 A I don't recall off the top of my head what

19 it goes to in the rate filing, but I believe it is

20 zero to maybe 32 or something along those lines. 04:01

21 Q So is it possible that somebody could have

22 eight for conviction points?

23 A Yes, it's possible.

24 Q But for this example in 35B of

25 Exhibit 103, by using the eight conviction points 04:01

1 were different numbers. 04:05

2 Q So, in other words, for some people, it
3 might have been 12 conviction points, and you
4 changed to 3 or something like that?

5 MR. LIEDER: Objection. Misstates 04:05
6 testimony.

7 THE WITNESS: Yeah. Something along --
8 something along those lines, yeah.

9 BY MR. SCOLNICK:

10 Q And I'm going to ask you questions similar 04:05
11 to the at-fault accidents, but when you calculated
12 your GIC premium for this policyholder and similar
13 policyholders, the one we're talking about in
14 paragraph 35B of your declaration, when you
15 calculated the GIC premium, you used eight instead 04:05
16 of one for conviction points; correct?

17 A Correct. We used whatever was in the
18 dataset that we were given, yes.

19 Q And you think that number is wrong;
20 correct? 04:06

21 A Yes. I think there's a high likelihood
22 that that's an incorrect entry.

23 Q And if you used instead the given GIC
24 premium and compared that to your calculated USAA
25 premium, this particular policyholder would be 04:06

1 paying less premium with GIC than with United 04:06
2 Services; is that right?
3 A Correct, yes.
4 Q But because you used what -- the eight
5 conviction points that you believe to be inaccurate, 04:06
6 this person is actually shown as paying less with
7 United Services than they are with GIC; is that
8 right?
9 A Correct.
10 MR. SCOLNICK: The transcript says "less 04:07
11 with increase." I asked was -- "less with United
12 Services."
13 (Reporter clarification.)
14 MR. SCOLNICK: Okay. Okay.
15 BY MR. SCOLNICK: 04:07
16 Q Paragraph 36 of your declaration.
17 A Okay.
18 Q And this is -- this is Exhibit 103 still.
19 And you say:
20 "There are two instances of data entry 04:08
21 errors for at-fault accidents and
22 conviction points that appear throughout
23 the spreadsheet provided by USAA. In all
24 instances where at-fault accidents
25 provided are greater than 5, differences 04:08

1 specific instance, trailer, you don't need -- 05:09
2 marital status does not come into play when
3 calculating premium.
4 Q Oh, I see.
5 And you know they're trailers because of 05:09
6 column E?
7 A Correct, yes.
8 Q Okay. But let's look at column -- let's
9 go to rows 51 and 52.
10 There you have zero as well, and the car 05:09
11 and truck/SUV are the vehicle type; correct?
12 A Correct, yes.
13 Q So do you know why that there's a zero for
14 marital status for those two vehicles?
15 A I do not, no. 05:10
16 Q How does -- what do you do with the zero
17 when you're calculating this -- the premium for this
18 vehicle?
19 A To the best of my recollection, in that
20 instance, the relativity factor would just be 1, 05:10
21 which is -- which it is for the majority of the
22 entries in the marital status anyway.
23 Q Marital -- entry of 1 means what? Means
24 married, single, divorced, widow?
25 A Off the top of my head, I believe it means 05:10

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1 discount or there's no discount for marital status. 05:12

2 Q So for this -- these examples we're
3 talking about in rows 51 and 52 of Exhibit 129, I'm
4 just wondering how you can determine that someone
5 either does get the 2 to 5 percent discount or 05:12
6 doesn't.

7 A It's a default that we set within the
8 model so that these can at least still be rated,
9 these vehicles can still be rated despite the zero
10 entry. 05:13

11 Q Is it arbitrary?

12 MR. LIEDER: Objection.

13 THE WITNESS: I wouldn't say it's
14 arbitrary because the large majority of relativities
15 underneath the marital status is 1, so you would 05:13
16 kind of go in status quo in terms of the relativity.

17 BY MR. SCOLNICK:

18 Q So you're defaulting to the most common
19 entry. Is that what you're saying?

20 A Correct, yes. 05:13

21 Q But it could be -- it could be wrong?

22 A It could be, yes.

23 Q Okay. Let's keep going. Column E we
24 talked about is "Vehicle Type." This is just
25 another rating factor, correct, that has 05:14

1 Q So in paragraph 12, you say -- in the 05:42
2 middle of the paragraph, you say:

3 "On average, the changes would occur 90
4 days into the policy."

5 Right? 05:42

6 A Yes.

7 Q That's an average, meaning that some
8 policyholders would make a change very early in the
9 policy, and some would make it very late; correct?

10 A Correct, yes. On average, it's halfway 05:43
11 through the policy, 90 days.

12 Q Okay. And policyholders can cancel their
13 policies before the end of the period; right?

14 A Correct, yes.

15 Q Have you seen that in the data? 05:43

16 A So that isn't directly reflected in the
17 data in the large datasets, Appendix B, but looking
18 at some of the underlying data in Mr. Strombom's
19 reports, yes, that is reflected.

20 Q So if somebody canceled a policy in -- 05:44
21 partway through a policy period, would your
22 methodology be able to account for that
23 cancellation, or would you just assume the person
24 paid premium for the whole six months?

25 MR. LIEDER: Objection. 05:44

1 THE WITNESS: In that particular example, 05:44
2 for the period where the cancellation took place,
3 the model would reflect the full amount of premium,
4 but then that policyholder would no longer be there
5 in the next period, the next six months, due to that 05:44
6 cancellation.

7 BY MR. SCOLNICK:

8 Q Understood.

9 Let's look at paragraph 13, little ii, of
10 Exhibit 106, Romanette ii, I think we'd call it. 05:45
11 Okay?

12 A Okay.

13 Q In this paragraph, is what you're doing
14 highlighting a discrepancy between the initial
15 premium for Castro, plaintiff Castro, calculated in 05:45
16 your model and then the one used by Mr. Strombom for
17 the March 30, 2021 policy period?

18 A Correct, yeah. This paragraph serves to
19 point out that what Mr. Strombom had for Castro as
20 of 3/31/2021 was significantly different than what 05:45
21 our model -- what our model calculated.

22 And when looking at the transactional data
23 that underlies his analysis, there were no
24 transactions within that time period that would lead
25 us to believe that there was such a significant 05:46

1 Q So now that you've gone through the policy 05:54
2 documents, do you believe there's still a
3 discrepancy between Mr. Castro's policy documents
4 and Mr. Strombom's initial premium?

5 A I believe that there's a difference 05:54
6 between the information in the declaration and what
7 was provided in the sample date 3/31/21.

8 Q And you've got your calculated premium
9 based on the sample data; right?

10 A Correct, yes. 05:55

11 Q And that's how you came up with \$1,600 --
12 \$1,609.41?

13 A Yes, correct.

14 Q But from what you've seen in the policy
15 documents, does it appear that your calculated 05:55
16 premium is wrong?

17 MR. LIEDER: Objection.

18 THE WITNESS: It's difficult to say
19 whether it's wrong or not. It's calculated with the
20 data provided. So I would believe that the premiums 05:56
21 from the data provided is calculated accurately, but
22 it appears that it differs from what was on the
23 declaration page.

24 BY MR. SCOLNICK:

25 Q Any sense of what would be a more accurate 05:56

1 source of information, the spreadsheets that USAA 05:56
2 created or the policyholder's declaration page?

3 A Given that the declaration page is what
4 the policyholders are handed at the beginning of the
5 policy, I would venture that that would be more 05:56
6 accurate.

7 Q Let's go back to Foot- -- to your rebuttal
8 report, which is Footnote -- sorry -- which is
9 document Exhibit 106.

10 THE REPORTER: Did we lose the defense 05:57
11 counsel?

12 MR. LIEDER: Oh, is he not --

13 MR. SCOLNICK: Oh, I'm here. I just need,
14 like, 30 seconds.

15 THE WITNESS: Is it all right if I go fill 05:57
16 my water bottle, ten seconds?

17 MR. SCOLNICK: Of course.

18 MR. LIEDER: I'll fill my glass too. So
19 let's take two minutes or so.

20 MR. SCOLNICK: Sounds good. 05:58

21 MR. LIEDER: Okay.

22 THE VIDEOGRAPHER: Should I take us off
23 the record, I'm assuming?

24 THE REPORTER: Yes. I need to run to the
25 restroom. Thank you. 05:58

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EXHIBIT I

CONFIDENTIAL

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

EILEEN-GAYLE COLEMAN and
ROBERT CASTRO, on behalf of
themselves and all others
similarly situated,

Plaintiffs, No. 3:21-cv-217-CAB-LL

vs.

UNITED SERVICES AUTOMOBILE
ASSOCIATION and USAA GENERAL
INDEMNITY COMPANY,

Defendants.

_____ /

-- CONFIDENTIAL --

VIDEO-RECORDED DEPOSITION OF JONATHAN GRIGLACK
REMOTE ZOOM PROCEEDING
Lyndhurst, New Jersey
Monday, April 16, 2022

REPORTED BY:
LESLIE ROCKWOOD ROSAS, RPR, CSR 3462
Pages 1 - 201 Job No. 5228814

CONFIDENTIAL

1 Q. So all that information you would need to
2 analyze specific to the member pool in each company;
3 right? In other words, the historical losses, the
4 trends, things like that, you would need to look at that
5 separately for GIC and for United Services to figure out 13:09:40
6 what -- why their base rates are what they are; is that
7 right?

8 A. That's generally right, yeah.

9 Q. Let me give you a hypothetical. Let's assume
10 that USAA wanted to just have one insurance company in 13:10:06
11 California, with all the GIC members and all the United
12 Services members together in one company. Are you with
13 me so far?

14 A. Yes.

15 Q. What would you need to do to calculate what the 13:10:21
16 base rates should be for that company?

17 MR. LIEDER: Objection as to form.

18 THE WITNESS: Historical losses, I believe we
19 would need, as well as historical premiums charged, and
20 again, there's definitely other more granular information 13:10:43
21 that they -- or that we would need to do what you're
22 asking.

23 Q. BY MR. SCOLNICK: Am I right that if you were to
24 combine the two companies, the base rates and
25 relativities would be different from what either United 13:10:59

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1 Services or GIC charge today?

2 MR. LIEDER: Objection as to form and
3 foundation.

4 THE WITNESS: I would have to say that yes, most
5 likely the base rates would be different. 13:11:17

6 Q. BY MR. SCOLNICK: Sitting here today, thinking
7 about this hypothetical, am I fair to say that you have
8 no idea what the changes to the base rates or
9 relativities would be compared to either GIC or United
10 Services today in this combined company? 13:11:31

11 MR. LIEDER: Objection. Form and foundation.

12 THE WITNESS: Yes, that's fair to say.

13 Q. BY MR. SCOLNICK: And let me just go back. I
14 don't think I got this answer.

15 Do you have any understanding as to why United 13:11:57
16 Services and GIC have different base rates?

17 A. No.

18 Q. Do you have any opinion about whether the GIC
19 base rates are too high or too low relative to United
20 Services? 13:12:28

21 A. No, I do not have an opinion on that.

22 Q. Okay. Go back you declaration, which is
23 Exhibit 88.

24 A. Okay.

25 Q. Okay. I'm looking at page 13, paragraph 19. 13:12:50

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1 Q. And as to the two that you did -- you were able
2 to test, you're still a little bit off in your model by a
3 few cents, you said?

4 A. Yeah, I don't have the exact difference in front
5 of me, but it was no more than maybe \$0.05, \$0.06 here or 13:49:40
6 there, so in total it was insignificant. It could be
7 rounding at that point.

8 Q. Is it your understanding that USAA provides auto
9 insurance -- when I say USAA, now I'm referring to both
10 GIC and United Services. 13:50:07

11 Is it your understanding that USAA provides auto
12 insurance in California in six-month policy periods?

13 A. Yes.

14 Q. Can a person's premium change during the
15 six-month policy period? In other words, you start with 13:50:25
16 a certain premium at the beginning of the six-month
17 period, and then over that period there are changes to
18 the premium you pay?

19 A. Yes. That can occur if they were to add a
20 vehicle, for example, something along those lines. 13:50:43

21 Q. What other things could happen that would cause
22 you to change your premium amount during a policy period?

23 A. An example of an insured, they could change
24 coverages -- or, sorry, I should say they can add a
25 coverage, they can get rid of a coverage, maybe update 13:51:07

CONFIDENTIAL

1 miles driven, something along those lines. Although, I
2 believe the miles driven example, that might be at a
3 renewal. So not a good example.

4 Q. How about changing a coverage limit, could that
5 happen during mid-policy? 13:51:22

6 A. I believe it could, but I'm not sure how
7 frequently that actually occurs.

8 Q. And you mentioned, I think, adding or deleting a
9 car; right, that's another possibility?

10 A. Correct. 13:51:40

11 Q. How about moving, could that change your premium
12 mid-policy period?

13 A. Given that the Pure Premium Band is one of the
14 rating factors, it could. But I'm not sure how USAA
15 actually handles that, if they just wait until the 13:51:56
16 renewal or not.

17 Q. So let's do another hypothetical here, where I'm
18 in the spreadsheet. I'm one of the GIC policyholders
19 that you calculate the six month premium on -- on
20 October 1, 2019, and you come up with \$500 for that 13:52:23
21 six-month period. Okay?

22 A. Okay.

23 Q. Okay. Then ten days into that period, so in
24 mid-October of 2019, I add a car to my policy. Would my
25 premium go up at that point? 13:52:48

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1 A. The policy in totals premium would go up, yes.

2 The -- so, yeah, you would individually have premiums per
3 vehicle. So in total, yes.

4 Q. Okay. So in other words, even though you
5 calculate \$500 on October 1 for my premium, ten days 13:53:11
6 later it's a higher number than \$500; correct, in this
7 hypothetical?

8 A. Correct.

9 Q. Your methodology doesn't account for those sorts
10 of mid-period changes, does it? 13:53:29

11 A. In that particular example, that would not be
12 captured as of 10/1/19. But as of 4/1/2020, it would be
13 captured --

14 Q. So how about --

15 A. If that car is still there. 13:53:49

16 Q. Right. That was my next question.

17 In this same hypothetical example, I add a car
18 on, you know, the 11th of October, but in late December I
19 remove it. That means that over the six-month policy
20 period I pay more than \$500. But if it's gone before the 13:54:05
21 next policy period, you wouldn't pick that up; right?

22 A. Correct. But in that example, it would be a
23 small prorated amount of that second car. It depends on
24 how quickly it was on and off the policy.

25 Q. So it would depend on the individual 13:54:24

CONFIDENTIAL

1 circumstances of how long that car was on the policy?

2 A. If USAA's billing is monthly, yeah, I would
3 assume so.

4 Q. Okay. And same would be true if you added a
5 coverage or increased a limit for a temporary period 13:54:41
6 during a policy period in between 10/1 and 4/1?

7 A. Correct.

8 Q. And your methodology wouldn't pick that up;
9 right?

10 A. Well, in that instance, are you saying that they 13:54:52
11 would add -- sorry, they would change -- for instance,
12 they would change limits, and then they would change them
13 back?

14 Q. Correct.

15 A. Yeah, I would say that's highly unusual. But, 13:55:08
16 yeah, correct, the -- our methodology, our model, would
17 not pick that up.

18 Q. Okay. Could you cancel a policy mid-period, in
19 the middle of the six-month period?

20 A. I believe so, yes. 13:55:25

21 Q. If I cancel before a six-month period is up, do
22 I need to pay the higher six-month premium?

23 A. I -- I'm not familiar with USAA and how they
24 would handle that. But I -- generally, I would think
25 that that's not the case, that you wouldn't have to pay 13:55:44

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1 the remaining months.

2 Q. So in your model, if you are calculating an
3 individual's premium on October 1, 2019, at \$500, but
4 they cancel three days into that period and don't end up
5 paying more than just a few dollars, how does your model 13:56:04
6 account for that?

7 A. I don't believe we have cancellation date as a
8 field, at least in the initial dataset that was provided.
9 So I'm sure that we wouldn't be able to account for that.

10 Q. You're sure that you wouldn't be able to account 13:56:33
11 for that?

12 A. I'm sure that --

13 Q. Do you know whether you've asked for a
14 cancellation date from USAA?

15 A. I would have to go back and look at our 13:56:48
16 correspondence. I can't recall off the top of my head if
17 we have or not.

18 Q. But sitting here right now, you're not aware
19 that -- of any way in which your model picks up a
20 mid-period cancellation for any of the policyholders? 13:57:01

21 A. Correct.

22 Q. Do you understand that there are two plaintiffs
23 in this case? Is that your understanding?

24 A. Yes.

25 Q. Have you ever talked to them? 13:57:25

CONFIDENTIAL

1 representation of what the charged amount would be.

2 Q. So, like, for example, if your model showed that
3 on 10/1/19, you would expect GIC to charge \$1,000 for the
4 next six months, but, in fact, GIC only charged 500, and
5 that's because there were changes, you would -- you would 15:11:22
6 just -- your ratio would be 50 percent?

7 A. In that example, yes.

8 Q. So what would you do with that 50 percent to
9 come up with the USAA premium or the United Services
10 premium? 15:11:37

11 A. Well, in that instance, that 50 percent would be
12 applied to that insured's corresponding calculated United
13 Services premium.

14 Q. So we've already talked about how some of the
15 relativities -- the actual -- the percentages for the 15:11:58
16 relativities are greater for USAA United Services than
17 they are for GIC; correct?

18 A. Correct.

19 Q. Okay. So let's -- let's take an example, then,
20 where you're coming up with an expected premium for six 15:12:17
21 months, starting on 10/1 of 2019, but then there are
22 changes during that six months that affect the -- the
23 actual amount of premium that's charged and collected
24 from a policyholder.

25 Wouldn't you need to know the dates of those 15:12:34

CONFIDENTIAL

1 changes and what those changes were to accurately
2 calculate what the United Services' premium would be?

3 MR. LIEDER: Objection.

4 THE WITNESS: In that instance, then we would
5 essentially need all transactions for every policyholder, 15:12:56
6 which doesn't seem like a reasonable ask given the amount
7 of transaction that there could be within any time frame.

8 So I think that that ratio approach in that
9 instance would be an appropriate estimate.

10 Q. BY MR. SCOLNICK: Okay. So going back, then, to 15:13:20
11 your -- the ten dates that you selected, it's twice per
12 year; correct?

13 A. Correct.

14 Q. Look at paragraph 25 of your declaration, which
15 is Exhibit 88. 15:13:34

16 A. Paragraph 25?

17 Q. Yeah. Give me a second. It's a big document.

18 Are you with me on paragraph 25?

19 A. Yes, page 15.

20 Q. Okay. So you're replicating what you're doing 15:13:57
21 for ten dates; correct? The methodology.

22 A. Right, correct.

23 Q. And the second sentence says, "These are a
24 snapshot of all effective policies as of April 1 and
25 October 1 of each of the years 2017 through 2021." 15:14:14

EXHIBIT J

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

EILEEN-GAYLE COLEMAN,) Case No.
and ROBERT CASTRO, on) 212CV217 MMAL
behalf of themselves and)
all others)
similarly situated,)
)
Plaintiffs,)
vs.)
)
UNITED SERVICES)
AUTOMOBILE ASSOCIATION)
and USAA GENERAL)
INDEMNITY COMPANY,)
)
Defendants.)
-----)

REMOTE PROCEEDINGS OF THE
VIDEOTAPED DEPOSITION OF ROBERT CASTRO
MONDAY, APRIL 18, 2022

REPORTED BY NANCY J. MARTIN
CSR. NO. 9504, RMR, RPR
PAGES 1 - 177

1 amended declaration.

2 A. Yes. Okay. There it is.

3 Q. Great. So if we take a look again at the
4 second page of the document, I'm looking at the middle
5 of the page, and it says "Revised six-month premium,
6 \$1,292."

7 Do you see that?

8 A. Yes.

9 Q. The second -- we're on the second page still.
10 The "adjustment reason" just above.

11 Do you see that section?

12 A. Yes.

13 Q. It says bodily injury liability limit
14 changed, vehicles 3 and 4. Uninsured motorists bodily
15 limit changed. UM, PD COB added. Uninsured motorist.
16 Property damage coverage added. Next to that rental
17 reimbursement added, vehicles 3 and 4. Then a waiver
18 of collision deductible added, vehicles 3 and 4.

19 Do you see those 5?

20 A. Yes, I see those.

21 Q. Do you recall making those changes to your
22 policy?

23 A. Yes.

24 Q. Why did you make those changes?

25 A. It appears that's when I was adding on the

1 ride-share protection. I was getting ready to
2 transition out of the military. I actually did a
3 little bit of Lyft to kind of force myself to interact
4 with essentially civilians again to kind of get used
5 to being around normal people because military life is
6 definitely a whole different world. So I did that for
7 a few months leading into my exit.

8 Q. So it does say -- if we look just under
9 premium 54.66 included in premium for rideshare gap
10 protection.

11 Do you see that?

12 A. Yes.

13 Q. And so the changes we were discussing a
14 moment ago are above that, and they refer to -- it
15 says "Limit changed."

16 Do you recall making those changes as well?

17 A. I'm sure it was all in that same transaction.
18 So I don't exactly know what I did right there other
19 than what is listed, but it was probably in line with
20 having to do the rideshare to make sure I had good
21 coverage for that just in case because I typically
22 drove around Los Angeles. So I wanted to make sure if
23 anything happened down there I was good to go.

24 Q. So we were just discussing 54.66 included the
25 premium for vehicle 3 for rideshare gap protection.

1 Do you see that?

2 A. Yes.

3 Q. And below that, 29.65 included premium for
4 vehicle 4 for rideshare gap protection?

5 A. Yes.

6 Q. So did you use both of your vehicles for
7 rideshare companies?

8 A. I used one for myself and my wife actually
9 did the other. We would partner up and both go into
10 L.A., both drive the majority of the night and then
11 stay at my dad's for, you know, the weekend, get back
12 on the road and Sunday head back home.

13 Q. How long did you drive the rideshare?

14 A. It wasn't too long. It was just a few months
15 to help kind of acclimate me back to civilian life,
16 and then did it sporadically throughout my time
17 looking for work just to help make ends meet.

18 Q. If you look at the middle of this page, it
19 says -- right next to the revised six-month premium,
20 six-month increase \$174.76.

21 Do you see that?

22 A. Yes.

23 Q. So by changing the limits for your policy and
24 adding the rideshare gap protection, that increased
25 your six-month premium by \$174.76?

1 A. Correct.

2 Q. Did you pay your insurance premium monthly?

3 A. Yes.

4 Q. And so the premium you paid in after making
5 these changes would be different than the premium you
6 paid in different months?

7 A. Correct.

8 Q. Did you have to report to USAA that you were
9 driving for Lyft?

10 A. I don't believe so. That wasn't asked during
11 the process.

12 MS. LIU: We'll go ahead and mark the next
13 exhibit, Exhibit 36, tab 38.

14 (Deposition Exhibit 36 was marked for
15 identification.)

16 THE WITNESS: Yep. 38.

17 BY MS. LIU:

18 Q. Great. So do you recognize this as an auto
19 policy from USAA GIC issued to you?

20 A. Yes.

21 Q. The policy period here is July 2, 2016 to
22 December 5, 2016.

23 Do you see that?

24 A. Yes.

25 Q. The last policy we looked at was April 17,

1 2016. So this was a couple months later?

2 A. Correct.

3 Q. But within that same policy period?

4 A. You said the first one is from April?

5 Q. So this policy period is from July to
6 September 5, 2016. And if you need to refresh your
7 memory, you can look back at Exhibit 35. That was
8 from April to September 5, 2016. So same end date,
9 just different --

10 A. Oh, yes. Correct.

11 Q. So if we look again at the second page here,
12 this says revised six-month premium, 1,273.67.

13 Do you see that?

14 A. Yes.

15 Q. Just above it, the "Adjustment Reason,
16 collision lost limit change, vehicles 3 and 4.

17 Do you see that?

18 A. Yes.

19 Q. So changing the collision loss limit --
20 strike that. Sorry.

21 Right next to the six-month revised premium.
22 Do you see there's a six-month decrease?

23 A. Correct.

24 Q. And so by changing your collision loss limit,
25 that actually resulted in a decrease to your policy by

1 \$18.33?

2 A. Correct.

3 Q. If you look just under that, it says 30.80
4 included in premium for vehicle 4 for rideshare gap
5 protection.

6 Do you see that?

7 A. I do.

8 Q. If we look at the first page, just under your
9 address, it says vehicle 4 is a Jeep, Patriot.

10 Do you see that?

11 A. I do.

12 Q. And in the previous exhibit we looked at, you
13 had had the rideshare gap protection for both vehicles
14 3 and 4.

15 Do you recall that?

16 A. Yes.

17 Q. So you changed -- you took rideshare gap
18 protection off one of your cars?

19 A. I believe at that point either me or my wife,
20 one of us wasn't doing the rideshare. So like I said,
21 there was a point where we were both doing it. Then
22 we kind of slowly stopped doing it, but we would still
23 sometimes have to redo it again to help makes ends
24 meet.

25 Q. So at this point when you only had the

1 rideshare gap protection for one car, you took it off
2 the other car and changed your loss limit, you saved
3 18.33 off your previous premium?

4 A. That's what it appears.

5 Q. So you explained that you would sometimes
6 reinstate or start driving for Lyft, you and your wife
7 would make changes and drive at different points over
8 a couple-year period; correct?

9 A. Correct.

10 Q. So would you change your rideshare gap
11 protection or add it or take it off depending on who
12 was driving at which point?

13 A. Exactly. I tried to make sure that there was
14 coverage. We made sure we didn't drive unless we had
15 that gap protection.

16 Q. So if you weren't driving for Lyft at a point
17 in time, you would take that protection off?

18 A. Correct.

19 Q. And then when you started driving again, you
20 would add it back?

21 A. Exactly. Because each time we stopped, we
22 weren't sure if we would be driving again. So we
23 wanted to just make sure we weren't paying for
24 something we weren't going to use.

25 Q. Understood.

1 MS. LIU: I'll take the next exhibit. I
2 believe that's 38 (sic), tab 37.

3 (Deposition Exhibit 37 was marked for
4 identification.)

5 MS. LIU: Sorry. This is going to be
6 Exhibit 37. Let me know when you have that up.

7 THE WITNESS: I have it right here.

8 BY MS. LIU:

9 Q. Do you recognize this as a USAA GIC policy
10 issued to you?

11 A. That's what it looks like.

12 Q. And the policy period here is July 15, 2016
13 to September 5, 2016?

14 A. Yep. My birthday moving forward.

15 Q. So same end date, but we've shifted forward
16 slightly?

17 A. Yes.

18 Q. If you look at that second page again. Do
19 you see revised six-month premium of \$1,408.95?

20 A. Yes.

21 Q. And that adjustment reason, it says change in
22 operator data and change in operator status.

23 A. Yes.

24 Q. If you look at -- if you jump ahead two
25 pages, at the last page of this document, the top of

Page 97

1 the page says, form code. Let me know when you see
2 that.

3 A. I'm there.

4 Q. Look in the middle of the page. There's a
5 section that says, "Change operator. Operator 2,
6 Vanessa Castro no longer qualifies for good student
7 discount."

8 Do you see that?

9 A. I do.

10 Q. So if we go back to where the six-month
11 premium total is, second page of this document. So
12 the change in operator data, your wife no longer
13 qualifying for the good student discount, that caused
14 your six-month premium to increase by \$135.28.

15 A. Correct.

16 MS. LIU: We'll introduce and mark Exhibit 38
17 as -- tab 34.

18 (Deposition Exhibit 38 was marked for
19 identification.)

20 THE WITNESS: I got it here.

21 BY MS. LIU:

22 Q. Do you recognize this as an auto policy
23 issued to you by USAA GIC?

24 A. Yes.

25 Q. The policy period is effective November 9,

EXHIBIT K

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

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)
 EILEEN-GAYLE COLEMAN, and)
)
 ROBERT CASTRO, on behalf of)
)
 themselves and all others)
)
 similarly situated,)
)
) Case No. 3:21-cv-00217-CAB-LL
)
 Plaintiffs,)
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)
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 vs.)
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)
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 United Services AUTOMOBILE)
)
 ASSOCIATION and USAA GENERAL)
)
 INDEMNITY COMPANY,)
)
)
)
 Defendants.)
)
 _____)

REMOTE VIDEOTAPED DEPOSITION OF
EILEEN-GAYLE COLEMAN
Wednesday, April 13, 2022
Volume I

Reported by:
NADIA NEWHART
CSR No. 8714
Job No. 5189879
PAGES 1 - 223

1 A When I bought my Jeep, I took the Mitsubishi
2 off.

3 Q And at that time, did you also delete your
4 husband from the policy?

5 A No. 03:01:57

6 MR. SCOLNICK: Okay. Let's take a look at
7 the next in order, which is Exhibit 16, tab 25.

8 (Exhibit 16 was marked for identification
9 and is attached hereto.)

10 THE WITNESS: It's up. 03:02:27

11 BY MR. SCOLNICK:

12 Q Okay. So this -- we're looking at here --
13 you agree that we're looking at a -- another USAA
14 General Indemnity Company auto policy issued to you.

15 This one is effective April 16, 2018 to 03:02:41
16 September 27, 2018; is that right?

17 A Yes.

18 Q And so this one is in effect for just five
19 months, not six.

20 Remember the last one started in March? 03:02:52

21 A Yes.

22 Q Okay. So it looks like -- do you agree with
23 me that about a month into the six-month policy, you
24 deleted the -- the Mitsubishi -- you took the
25 Mitsubishi off your policy? 03:03:12

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1 A Yes.

2 Q Okay. And, in fact, if you look at the
3 description of vehicles, there's only one now,
4 right, the Dodge Charger?

5 A Yes. 03:03:19

6 Q And on the same page, if you go down to the
7 line at the bottom that says "ADJUSTMENT REASON," it
8 says (as read):

9 "Change in operator status OP 01."

10 And (as read): 03:03:28

11 "Deletion of vehicle 01 ('12
12 Mitsubishi)."

13 Do you see that?

14 A Yes.

15 Q So again, that's saying that it -- this is -- 03:03:39
16 that at this point a month into your -- a month into
17 your six-month policy, you -- you took the
18 Mitsubishi off the policy, correct?

19 A Yes.

20 Q And let's flip to the next page. 03:03:52

21 It -- in the middle of the page, it says (as
22 read):

23 "Revised 6 month premium...

24 \$942.37."

25 Do you see that? 03:04:00

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1 A Yes.

2 Q And it says (as read):

3 "6 month decrease... \$524.13."

4 Do you see that?

5 A Yes.

03:04:09

6 Q So do you -- do you understand this to mean
7 that when you took the Mitsubishi off of your policy
8 a month into the six-month term, your -- your
9 premium decreased by \$524.13?

10 A Yes.

03:04:19

11 Q Okay. And I think you already answered this,
12 but did you ever get a new car during the time that
13 you were insured by USAA?

14 A Yes. I got a Jeep, which is why I took off
15 the Mitsubishi.

03:04:31

16 Q Gotcha. A 20- -- 2018 Jeep, right?

17 A Yes, 2018.

18 MR. SCOLNICK: Okay. All right. Let's look
19 at -- next will be 17. Exhibit 17 will be tab 28.

20 (Exhibit 17 was marked for identification
21 and is attached hereto.)

03:05:11

22 THE WITNESS: Okay.

23 BY MR. SCOLNICK:

24 Q Okay. Now I'm trying to keep all the dates
25 straight here, but if you look at -- this is -- if

03:05:21

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1 you look at the policy period on the first page, is
2 this another USAA General Indemnity Company policy
3 issued to you effective April 16th, 2018 to
4 September 27, 2018?

5 A What -- what was this again? This is the 03:05:40
6 updated?

7 Q Yeah. I'm asking whether this -- this
8 appears to be another policy issued to you on the
9 dates effective April 16th, 2018 to September 27,
10 2018. 03:05:53

11 A Yeah. If this is for my Jeep, then yes.

12 Q Yeah. We can take a look. Look at the
13 fourth page.

14 A Okay.

15 Q Okay. So you -- it was this -- it was at the 03:06:10
16 same time, right, that you took off the Mitsubishi
17 and added the Jeep?

18 A Yes.

19 Q Okay. So this -- this document, Exhibit 17,
20 is where you added the Jeep. If you look at the 03:06:26
21 description of vehicles, it shows 2018 Jeep
22 Cherokee.

23 Do you see that?

24 A Yes.

25 Q Okay. And the next page shows the -- the 03:06:41

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1 same box we've been looking at. It says (as read):

2 "ADJUSTMENT REASON."

3 It says (as read):

4 "Added vehicle 3."

5 Do you see that? 03:06:53

6 A Yes.

7 Q And vehicle 3 is the Jeep?

8 A Yes.

9 Q Okay. And then it shows revised 6 month
10 premium of 1,570.88, right? 03:07:04

11 A Yes.

12 Q And then six-month increase of \$104.38,
13 right?

14 A Yes.

15 Q So am I right, then, that when you -- you had 03:07:11
16 two cars insured, and a month into your six-month
17 policy, you took the Mitsubishi off, and that
18 dropped your premium by \$542.13.

19 And then you added the Jeep which made the
20 premium go up by \$104.38; is that right? 03:07:29

21 A That's what it says here.

22 Q Okay. Do you remember if you ever changed
23 the address, the garage address associated with your
24 cars?

25 A The garage address? What do you mean? Or 03:07:51

1 A Yes.

2 Q And that -- that was your address?

3 A Yes.

4 Q Okay. Let's go to the second page of this

5 document, and in the -- the box that we've been 03:10:35

6 looking at on the other documents, it says (as

7 read):

8 "6 month premium of \$1,427.03."

9 Do you see that?

10 A Yes. 03:10:46

11 Q Okay. And it also, again, says (as read):

12 "\$175.38 included in the premium for

13 vehicle 2," which is the Charger --

14 A Uh-huh.

15 Q (As read): 03:11:02

16 -- "as a result of an accident."

17 Do you see that?

18 A Yes.

19 Q Do you remember getting in an accident with

20 the Charger in or around 2020? 03:11:11

21 A Yes. I don't know if it was 2020, but yes,

22 there was -- it wasn't his fault. He -- we got

23 rear-ended.

24 Q Your -- your husband was driving?

25 A Yes. 03:11:29

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1 Q Okay. And -- and do you recall that the
2 accident was determined not to be his fault?

3 A Yes, because we didn't have to pay for the
4 repairs.

5 Q Okay. All right. Let's -- let's keep in 03:11:43
6 mind now just because I'm going to move to another
7 document.

8 But I want you to remember that this -- this
9 document, Exhibit 18, is in effect from
10 September 2020 to March 2021, okay? 03:12:03

11 A Okay.

12 MR. SCOLNICK: Now, let's go to the next in
13 order, which is 19, Exhibit 19, tab 22.

14 (Exhibit 19 was marked for identification
15 and is attached hereto.) 03:12:22

16 BY MR. SCOLNICK:

17 Q Let me know when you see it, please.

18 A It popped up.

19 Q Okay. And -- and am I right that we're
20 looking at another USAA General Indemnity Company 03:12:29
21 policy, auto policy issued to you; this one is in
22 effect from February 06, 2021 to March 27, 2021?

23 A Yes.

24 Q So this is about the last month and a half of
25 the last policy we just looked at? 03:12:46

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1 A Uh-huh.

2 Q Okay.

3 A Yes.

4 Q Okay. And here, this one on the top left box
5 says that you're -- that your address is in Sioux Falls, South Dakota, right? 03:13:01

7 A Yes.

8 Q And you said you -- you were going to move to
9 South Dakota but you never did?

10 A Yes. 03:13:12

11 Q What -- can you explain.

12 Like was that a -- a change in -- in -- were
13 you being sent there by the military?

14 A No. My husband was getting out of the
15 military, so we were making preparations to move out there. 03:13:22

17 Q And you actually had an address?

18 A Yes.

19 Q What is that address? A home or an
20 apartment? 03:13:34

21 A Or that's -- that's the address. And we
22 weren't going to -- we were looking for apartments
23 out there too, but it was my job that we couldn't go
24 out there. We couldn't move out there physically
25 but -- 03:13:48

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1 Q So what is -- sorry. Go ahead.

2 A I was saying so that's why we weren't able to
3 get an actual address or -- or work on getting an
4 actual address. I was trying to make --

5 Q What -- what is -- finish, please. 03:13:59

6 A Sorry. I was trying to make sure that I had
7 a job out there before we got an address.

8 Q What is 31- -- 3916 North Potsdam Avenue in
9 Sioux Falls?

10 A That is a -- a P.O. Box or like a mail -- 03:14:21
11 like one of those things that you can get from the
12 post office, and they'll mail you everything there.

13 Q Okay. So you -- you notified USAA in early
14 2021 that you were moving to South Dakota and you
15 gave USAA the new address, right? 03:14:40

16 A Yes.

17 Q Okay. Because what I want to look at is the
18 last -- the second page of this document. And in
19 the middle of the page, under "ADJUSTMENT REASON,"
20 it says (as read): 03:14:58

21 "Change in vehicle location 2 and 3
22 for both vehicles."

23 Do you see that?

24 A Yes.

25 Q Okay. So when you notified USAA that you had 03:15:05

1 a new address in South Dakota, the premium changed,
2 right?

3 A Yes.

4 Q So if you look at the next line, it says (as
5 read):

03:15:14

6 "Revised 6 month premium \$1,737.06."

7 Do you see that?

8 A Yes.

9 Q And a six-month increase of \$310.03, right?

10 A Yes.

03:15:27

11 Q Okay. So you never actually moved, but you
12 did notify USAA that you were going to have a
13 different address, correct?

14 A Eventually, yes, we were going to head over
15 there.

03:15:42

16 Q And -- and because of that different address,
17 your premium went up for the last month and a half
18 of your six-month policy by a little over \$310?

19 A Yes.

20 Q Okay. Do you remember whether you ever
21 changed coverages for your cars during the period
22 where you had GIC insurance?

03:15:53

23 A I just changed not the collision, but I
24 changed like if we wanted to get -- what is it
25 called? They have like options where you can get --

03:16:17

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EXHIBIT L

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

EILEEN-GAYLE COLEMAN
and ROBERT CASTRO, on behalf
of themselves and all others
similarly situated,

Plaintiffs,

vs.

Case No. :
3:21-CV-00217-RSH-KSC

UNITED SERVICES AUTOMOBILE
ASSOCIATION and USAA GENERAL
INDEMNITY COMPANY,
Defendants.

VIDEO-RECORDED REMOTE VIDEOCONFERENCE DEPOSITION OF
EXPERT ALLAN I. SCHWARTZ
Thursday, February 23, 2023

Reported by: Michelle Bulkley, CSR #13658
Job #5771909; Pages 1 - 210

1 Q Other than Ms. Tollar, anyone else assist 11:12
2 you with this rebuttal report, Exhibit 140?

3 A No.

4 Q And same questions as to the opening
5 report. As to plaintiffs' counsel, do you recall 11:12
6 them commenting on a draft of your rebuttal report?

7 A Not specifically.

8 Q And you've reviewed this report since last
9 December?

10 A Yes. 11:13

11 Q Anything in here that you'd like to amend
12 or correct?

13 A No.

14 Q Okay. We talked -- I asked a question a
15 second ago about Mr. Griglack. Who is 11:13
16 Jonathan Griglack?

17 A He's an actuary who works for another firm
18 that plaintiffs' counsel retained to do certain
19 calculations and analyses.

20 Q And in performing your work in this case, 11:13
21 you relied on Mr. Griglack's analyses; correct?

22 A Yes.

23 Q Did you assist Mr. Griglack in his
24 analyses?

25 A I wouldn't say assist. 11:14

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1 the phone with counsel for the plaintiffs. 01:54

2 BY MR. SCOLNICK:

3 Q So tell me if I have this right. For
4 purposes of what you did to calculate damages for an
5 individual policyholder, you took the actual GIC 01:54

6 premium, and then you subtracted one under --
7 subtracted what plaintiffs contend the policyholders
8 should have been charged for premium, and if there's
9 a positive number, that means damages; is that
10 accurate? 01:54

11 MR. LIEDER: Objection. Form.

12 THE WITNESS: No.

13 BY MR. SCOLNICK:

14 Q Can you describe what you did, at a high
15 level anyway, to figure out whether and to what 01:55
16 extent any policyholder was damaged?

17 A I relied on information supplied by
18 Mr. Griglack which showed what he calculated for a
19 GIC premium based on the spreadsheets provided by
20 the defendants and what he calculated for that same 01:55
21 policyholder in United Services based on the
22 characteristics of that policyholder and the rating
23 plan for United Services and then made a comparison
24 between those two values, you know, three different
25 ways. 01:56

1 semantics, but I would say the appropriate one is 03:41
2 the one that's consistent with the law. And that's
3 my standard for determining what's appropriate.

4 Q Do you know --
5 (Simultaneous speakers.) 03:41

6 A But I don't know which one the Court is
7 going to determine is the appropriate legal
8 standard.

9 Q Okay. Let's go with the first one. I
10 think we talked a little bit about it already. You 03:42
11 called it the modified primary; is that right?

12 A Yes.

13 Q And that -- am I right that that's just
14 the primary methodology, which is the difference
15 between indicated GIC and indicated USAA with one 03:42
16 modification, and that's the modification that you
17 describe at paragraphs 8 and 9 of your report; is
18 that right?

19 MR. LIEDER: You said 8 and 9?

20 MR. SCOLNICK: Yes. 8 and 9 of the 03:42
21 report, which is Exhibit 104.

22 THE WITNESS: Yes.

23 BY MR. SCOLNICK:

24 Q And am I generally correct then that the
25 modification is, for any of the evaluation dates 03:42

1 the good driver class? 03:45

2 A Because my understanding is that the
3 statute requires you to be -- or to offer from the
4 company with the lower rate. So in circumstances
5 GIC had a lower rate than USAA, someone would get 03:45
6 the GIC rate. There wouldn't be an offset because
7 you'd always have the ability to be in the lower
8 rated company.

9 Q Okay. Then let's switch now to your
10 alternate damages methodology. That is generally 03:46
11 what you described in your prior declaration at the
12 class certification stage; correct?

13 A Yes.

14 Q And what that one -- what the alternate
15 methodology does is you take the primary 03:46
16 methodology -- and we talked about this already --
17 and you increase the indicated United Services
18 premium by a factor that you call A; correct?

19 A Right.

20 Q And the factor A, is that meant to 03:46
21 balance -- is that your term? -- balance the damages
22 for GIC policyholders against the theoretical
23 increase in the premium for United Services?

24 A Yes.

25 Q Can you explain what that means? 03:46

1 A Well, it's saying that you calculate -- 03:47
2 you have to -- you come up with a factor A such that
3 when you multiply A by the indicated USAA premium
4 and you compare that to the GIC premium, you get a
5 damage number. 03:47

6 And when you multiply A by the USAA
7 premium, you get a modified premium, which is higher
8 than the USAA premium by a certain amount. And what
9 you -- what you do is you equalize the values -- or
10 you figure out the value for A such that the 03:47
11 increase in the premium for USAA is equal to the
12 calculated damage to GIC policyholders.

13 Q Is what you're trying to achieve, in terms
14 of balance, ensuring that whatever loss in premium
15 GIC might experience, there would be a corresponding 03:48
16 increase in premium in United Services?

17 A It's balancing those two together, yes.

18 Q And I know you said earlier that this is
19 meant to account for one possible legal
20 interpretation the Court might take, but I'm just -- 03:48
21 what is the purpose of balancing those two?

22 A It's a way of saying that if USAA had
23 charged -- had charged those modified premiums, it
24 would have collected more premium, and USAA would
25 have collected less premium from the GIC 03:49

EXHIBIT M

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

EILEEN-GAYLE COLEMAN,) Case No.
and ROBERT CASTRO, on) 212CV217 MMAL
behalf of themselves and)
all others similarly)
situated,)
)
Plaintiffs,)
vs.)
)
UNITED SERVICES)
AUTOMOBILE ASSOCIATION)
and USAA GENERAL)
INDEMNITY COMPANY,)
)
Defendants.)
-----)

REMOTE PROCEEDINGS OF THE
VIDEOTAPED DEPOSITION OF ALLAN SCHWARTZ
WEDNESDAY, MAY 18, 2022

REPORTED BY NANCY J. MARTIN
CSR. NO. 9504, RMR, RPR
PAGES 1 - 197

1 talking to you about your understanding of the case
2 and what you've done.

3 You said that you're willing to take an
4 understanding from plaintiffs' counsel and use it for
5 purposes of your analysis; right?

6 A. Right.

7 Q. And sometimes you might disagree with that
8 understanding and you might have a conversation with
9 plaintiffs' counsel and say, "I'm not sure this makes
10 sense, the assumption that you've given me," and you
11 talk about it. Isn't that what you said?

12 A. Yes.

13 Q. If you disagreed, even vehemently, with what
14 not necessarily these plaintiffs' counsel but some
15 plaintiff counsel were theorizing in a case, and you
16 explained your disagreement and plaintiffs' counsel
17 nevertheless pressed ahead with their understanding of
18 the law, would that change your analysis in any way,
19 or would you adopt that understanding notwithstanding
20 your disagreement?

21 A. Again, in terms of what I'm going to do, it
22 would be based on what counsel alleges is the meaning
23 of the law, and that's perfectly consistent with
24 actuarial standards of practice where actuaries rely
25 on information or assumptions provided by other people

1 as long as they make an appropriate disclosure.

2 And so I'm making a disclosure that I'm
3 relying on what counsel is representing. And so
4 that's consistent with actuarial standards of
5 practice.

6 Q. Let me push on that just a little.

7 Suppose -- very extreme hypothetical.
8 Suppose plaintiffs' counsel in this case, suppose
9 their theory was that insurance should be free. Would
10 you write up a damages model based on that theory?
11 Would that be actuarially sound?

12 A. If I represented or I said I'm relying on
13 that representation by counsel and I disclosed it, and
14 I say, "I'm not taking responsibility for it" and I
15 did a calculation based on that, I believe that would
16 be consistent with actuarial standards of practices.

17 Q. So that was a long digression. If we can get
18 back to the -- so back to the concept of just this is
19 your declaration. You've signed it. Is there
20 anything in the declaration in the last month and
21 change that now gives you pause, that you would like
22 to correct?

23 A. No.

24 Q. You think the declaration is still accurate
25 from front to back?

EXHIBIT N

SGRisk Model Analysis

Exhibit 1

Comparison of GIC and USAA Premiums by Intervals

Data valued from 3/31/2018 to 9/30/2021

As of 3/31/2018*

Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
GIC > USAA 20% or more	50.5%	48.2%	44.9%
GIC > USAA 10%-20%	37.0%	38.5%	36.6%
GIC > USAA 0%-10%	10.6%	11.3%	14.9%
USAA > GIC 0%-10%	1.8%	1.9%	3.2%
USAA > GIC 10%-20%	0.1%	0.1%	0.4%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

As of 3/31/2019

Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
GIC > USAA 20% or more	52.0%	50.0%	46.6%
GIC > USAA 10%-20%	35.6%	37.0%	35.4%
GIC > USAA 0%-10%	10.5%	11.1%	14.3%
USAA > GIC 0%-10%	1.7%	1.9%	3.3%
USAA > GIC 10%-20%	0.1%	0.1%	0.4%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

As of 3/31/2020

Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
GIC > USAA 20% or more	41.7%	39.4%	37.0%
GIC > USAA 10%-20%	40.3%	41.6%	37.0%
GIC > USAA 0%-10%	14.9%	15.6%	18.9%
USAA > GIC 0%-10%	2.9%	3.1%	6.1%
USAA > GIC 10%-20%	0.2%	0.3%	1.0%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

As of 3/31/2021

Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
GIC > USAA 20% or more	39.4%	37.2%	35.0%
GIC > USAA 10%-20%	40.3%	41.6%	36.9%
GIC > USAA 0%-10%	16.5%	17.2%	19.9%
USAA > GIC 0%-10%	3.5%	3.7%	7.1%
USAA > GIC 10%-20%	0.3%	0.3%	1.2%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

Total (12/28/2017-9/30/2021)

Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
GIC > USAA 20% or more	44.8%	42.6%	39.9%
GIC > USAA 10%-20%	38.5%	39.9%	36.4%
GIC > USAA 0%-10%	13.8%	14.4%	17.5%
USAA > GIC 0%-10%	2.7%	2.8%	5.3%
USAA > GIC 10%-20%	0.2%	0.2%	0.8%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

Notes:

*from 12/28/17-3/31/18

Values come directly from Appendices C-5 through C-12

As of 9/30/2018

Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
GIC > USAA 20% or more	51.2%	49.0%	45.7%
GIC > USAA 10%-20%	36.4%	37.9%	36.1%
GIC > USAA 0%-10%	10.6%	11.2%	14.6%
USAA > GIC 0%-10%	1.7%	1.8%	3.2%
USAA > GIC 10%-20%	0.1%	0.1%	0.4%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

As of 9/30/2019

Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
GIC > USAA 20% or more	48.9%	46.8%	43.7%
GIC > USAA 10%-20%	36.9%	38.2%	35.6%
GIC > USAA 0%-10%	11.9%	12.6%	15.8%
USAA > GIC 0%-10%	2.2%	2.3%	4.3%
USAA > GIC 10%-20%	0.2%	0.2%	0.6%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

As of 9/30/2020

Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
GIC > USAA 20% or more	39.2%	36.8%	34.7%
GIC > USAA 10%-20%	40.9%	42.3%	37.3%
GIC > USAA 0%-10%	16.4%	17.2%	20.0%
USAA > GIC 0%-10%	3.3%	3.5%	6.9%
USAA > GIC 10%-20%	0.3%	0.3%	1.1%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

As of 9/30/2021

Premium Difference	All Policyholders w.Collision	Good Drivers w.Collision	All Policyholders
GIC > USAA 20% or more	40.0%	38.0%	35.5%
GIC > USAA 10%-20%	39.7%	40.8%	36.3%
GIC > USAA 0%-10%	16.4%	17.1%	19.7%
USAA > GIC 0%-10%	3.6%	3.8%	7.2%
USAA > GIC 10%-20%	0.3%	0.3%	1.2%
USAA > GIC 20% or more	0.0%	0.0%	0.0%

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8 *Attorneys for Defendants*
 9 *United Services Automobile Association and*
USAA General Indemnity Company

10
 11 UNITED STATES DISTRICT COURT
 12 SOUTHERN DISTRICT OF CALIFORNIA

14 EILEEN-GAYLE COLEMAN, and
 15 ROBERT CASTRO, on behalf of
 themselves and all others similarly
 16 situated,

17 Plaintiffs,

18 v.

19 UNITED SERVICES AUTOMOBILE
 ASSOCIATION and USAA GENERAL
 INDEMNITY COMPANY,

20 Defendants.
 21

CASE NO. 3:21-cv-00217-RSH-KSC

DECLARATION OF QUINN SANER

Judge: Hon. Robert S. Huie
 Action Filed: February 4, 2021

PER CHAMBERS RULES, NO ORAL
 ARGUMENT UNLESS SEPARATELY
 ORDERED BY THE COURT

DECLARATION OF QUINN SANER

I, Quinn Saner, declare as follows:

1. I am currently employed as a Director of Property & Casualty Pricing and Reserving Actuary at United Services Automobile Association (“USAA”). I offer this declaration in support of Defendants’ opposition to Plaintiffs’ motion for class certification and Defendants’ motion to exclude the opinions and testimony of Plaintiffs’ expert witnesses.

2. Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently to these facts.

3. I am generally familiar with Plaintiffs’ allegations in this case. Among other materials, I have reviewed the Amended Complaint, Plaintiffs’ Motion in Support of Class Certification, and the supporting declarations of Jonathan Griglack and Allan I. Schwartz filed in support of that motion.

4. The specifics of pricing automobile insurance are highly detailed and complex. My statements below are written to explain the process in more general terms and, in many instances, do not include the in-depth details and complexities that are not material to the statement being made.

A. My Background and Experience at USAA.

5. I earned a Bachelor of Arts and a Master of Arts degree in mathematics from Boston University in 2000. I earned a Master of Business Administration degree from the University of Massachusetts Amherst in 2022 with a focus in business analytics. I am also an Associate of the Casualty Actuarial Society.

6. I have worked in the insurance industry as an actuary for the past twenty years.

7. Since May 2021, I have worked at USAA in my current role as a Director of Property & Casualty Pricing and Reserving Actuary. In that capacity, I am responsible for USAA’s auto insurance pricing across the Western region, including

1 California, as well as oversight of regional pricing strategies and methodologies. Over
2 the past year, while in my current role at USAA, I have gained extensive personal
3 knowledge about USAA’s base rates, rate factors, and relativities—including how each
4 of these items are calculated, and the role played by the California Department
5 Insurance (“CDI”) in the rate-application and rate-approval process.

6 **B. USAA’s Base Rates, Rate Factors, and Rate Relativities**

7 8. An individual policyholder’s auto insurance premium for a particular type
8 of coverage is calculated by first applying the base rate by coverage—base rates are
9 the same for each policyholder. Second, the insurance company applies the
10 policyholder-specific rate relativities—which are multiplicative factors that may
11 increase or decrease the cost of a particular coverage premium based on the specific
12 risk characteristics applicable to that policyholder—to arrive at an individual
13 policyholder’s premium.

14 9. Once a policyholder’s premium is calculated for a specific coverage, the
15 total premium is simply the sum of the coverage premiums for each of the coverages
16 that the policyholder selects.

17 ***Base Rates.***

18 10. As just noted, an insurance company’s base rate for a particular coverage
19 is the same for each policyholder. The base rate is the starting dollar amount in the
20 premium calculation for all policyholders prior to the application of any rate
21 relativities used to reflect the difference in risk characteristics. It is calculated based on
22 projected losses to obtain a reasonable rate of return.

23 11. Because the cost of providing insurance is unknown until the policy
24 period has expired, the calculation of a base rate for a particular type of coverage is
25 forward-looking based on predictions rather than actual costs. Therefore, insurance
26 pricing seeks to come up with a reasonable prediction of future losses. Typically, the
27 best predictor of future losses are historical losses.

28

1 12. When Defendants “United Services”¹ and USAA General Indemnity
 2 Company (“GIC”) calculate their anticipated losses for purposes of rate setting, each
 3 company uses a generalized linear model (“GLM”) with sequential analysis that relies
 4 on three to five years of prior actual loss data from each company’s historic book of
 5 business. Thus, each company’s base rates are tied to its actual historic loss portfolio.

6 13. Generally, a company that has a history of higher losses per insured (such
 7 as GIC) will need higher base rates to cover the anticipated future losses, whereas a
 8 company that experiences a history of lower losses per insured (such as United
 9 Services) will need lower base rates. Both historically and today, GIC’s policyholders,
 10 on average, experience higher losses—and thus higher projected future losses—than
 11 United Services’ policyholders on average. The differences in GIC’s and United
 12 Services’ base rates account for this difference.

13 14. Loss cost is a unique measure to insurance and is used to understand the
 14 portion of risk that is attributable directly to losses. It is calculated as total losses
 15 divided by the total number of exposures. Therefore, it is a measure of the average
 16 loss expected to be incurred for each risk exposure. A higher loss cost indicates higher
 17 average losses, a higher number of average claims, or both. The table below shows the
 18 incurred calendar year loss costs for both United Services and GIC. As mentioned,
 19 GIC loss cost is consistently higher. This shows GIC policyholders experience higher
 20 losses on average than policyholders in United Services.

21
 22 Incurred Calendar Year Loss cost

Calendar Year	United Services	GIC
2018	\$660.10	\$765.90
2019	\$683.10	\$791.90

23
 24
 25
 26
 27
 28 ¹ I use “USAA” to refer to the parent company. I use “United Services” to refer
 specifically to the entity that provides auto insurance in California.

2020	\$571.00	\$684.30
2021	\$675.20	\$840.20

15. Under California’s Proposition 103, the CDI must review and approve any changes to a company’s base rates before such changes can go into effect. The CDI has reviewed and approved United Services’ base rates since approximately 1989, when Proposition 103 went into effect. And the CDI has reviewed and approved GIC’s base rates since approximately 1998, when USAA first established GIC in California.

16. The current auto insurance base rates in California for United Services and GIC have been in effect since February 12, 2020. They are as follows:

Coverage (see Rental Reimbursement below)	United Services	GIC
Bodily Injury	\$344.21	\$432.95
Property Damage	\$383.11	\$418.82
Medical Payment	\$30.90	\$45.43
Uninsured Motorist/Underinsured Motorist Bodily Injury	\$60.53	\$80.67
Uninsured Motorist Property Damage	\$40.84	\$52.65
Comprehensive	\$51.85	\$86.19
Collision	\$354.62	\$619.54
Towing & Labor	\$17.34	\$20.60
Waiver of Collision Deductible	\$1.74	\$3.53
Rental Reimbursement (effective August 1, 2019)		
Economy	\$37.10	\$54.00
Standard	\$41.11	\$59.00
Multi-passenger/truck	\$55.52	\$90.00
Large SUV	\$73.59	\$125.00

1 17. Between January 1, 2017, and today, the base rates in both United
2 Services and GIC have changed. On the following dates, rate changes have occurred:

- 3 • 2017-12-28
- 4 • 2019-08-01
- 5 • 2020-02-12
- 6 • 2022-07-25 (not yet effective)

7 ***Rating Factors.***

8 18. Rating factors are used by insurance companies to adjust premium for a
9 particular policyholder to account for the relative degree of risk of the specific
10 policyholder as compared to other policyholders insured by the same company.

11 19. California’s Proposition 103 requires that insurers apply three mandatory
12 rating factors when calculating premiums: driving safety record, annual miles driven,
13 and years of driving experience.

14 20. Proposition 103 also permits insurers to apply a list of optional factors
15 adopted by regulation, each of which have a substantial relationship to the risk of loss.
16 These optional rating factors are:

- 17 • type of vehicle;
- 18 • vehicle performance capabilities;
- 19 • type of use of vehicle;
- 20 • percentage use of the vehicle by the rated driver;
- 21 • multi-vehicle households;
- 22 • academic standing of the rated driver;
- 23 • completion of driver training or defensive driving course by the rated driver;
- 24 • vehicle characteristics (engine size, repairability, etc.);
- 25 • marital status of the rated driver;
- 26 • persistency (years insured by the company);
- 27 • non-smoker;
- 28

- 1 • secondary driver characteristics;
- 2 • multi-policies with the same or an affiliated company;
- 3 • relative claims frequency; and
- 4 • relative claims severity.

5 21. The CDI removed gender as an optional rating factor in 2019.

6 22. USAA considers all the optional rating factors except non-smoker.

7 23. Claims frequency and claims severity are considered within a location
8 rating factor defined by zip code.

9 ***Relativities.***

10 24. Each rating factor is divided into two or more categories that determine
11 the adjustment to the coverage base rate for each policyholder. For example, the
12 “annual mileage” rating factor is determined based on mileage ranges in increments of
13 500 miles. Policyholders with higher annual mileage are more likely to be surcharged,
14 those with lower annual mileage are more likely to receive discounts, those in the
15 average category would see no change in their base premium. As another example, the
16 “years of driving experience” is divided into categories associated with the specific
17 numbers of years of driving experience a policyholder has—from 0 all the way up to
18 72+.

19 25. To accomplish these adjustments, each category within a given rating
20 factor has a calculated “relativity.” The intent of these rate relativities is to more fairly
21 allocate the risk among the insurer’s book of business—since not every policyholder
22 presents the exact same amount of risk.

23 26. To calculate rate relativities, USAA uses historic data and a GLM with
24 sequential analysis as prescribed by the CDI. The GLM with sequential analysis
25 provides indicated rate relativities by coverage and rating factor. These rate relativities
26 indicate the potential risk of each category within a rating factor as compared to the
27 other categories. A relativity less than 1.0 suggests that category is less risky than
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1 average and a relativity greater than 1.0 suggests that category is more risky than
 2 average.

3 27. By way of example, I will now walk through how United Services would
 4 apply the years driving experience rating factor for Bodily Injury Coverage for three
 5 hypothetical policyholders.

6 28. Attached is Exhibit A, a copy of USAA’s rating manual effective August
 7 1, 2019. The chart on the next two pages is pasted from USAA’s rating manual and it
 8 shows the various potential relativities that United Services could apply to adjust the
 9 base rate for each coverage to account for a particular policyholder’s years of driving
 10 experience.

11 **Years Driving Experience**
 12 **USAA**

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	2.01	2.01	1.42	1.10	1.17	1.81	1.10
1	1.83	1.68	1.33	1.10	1.20	1.62	1.10
2	1.64	1.51	1.26	1.07	1.24	1.50	1.07
3	1.46	1.47	1.22	1.05	1.27	1.44	1.05
4	1.36	1.46	1.21	1.02	1.31	1.37	1.02
5	1.26	1.45	1.20	1.02	1.33	1.31	1.02
6	1.15	1.43	1.10	0.97	1.33	1.25	0.97
7	1.12	1.27	1.10	0.97	1.32	1.20	0.97
8	1.06	1.16	1.06	0.92	1.31	1.15	0.92
9	1.01	1.06	0.99	0.92	1.30	1.09	0.92
10	0.98	0.96	0.99	0.92	1.29	1.04	0.92
11	0.94	0.94	0.99	0.92	1.28	1.00	0.92
12	0.92	0.93	0.99	0.92	1.26	0.99	0.92
13	0.90	0.91	0.95	0.92	1.23	0.98	0.92
14	0.89	0.89	0.95	0.92	1.20	0.96	0.92
15	0.89	0.88	0.95	0.92	1.18	0.95	0.92
16	0.88	0.88	0.95	0.92	1.16	0.94	0.92
17	0.88	0.87	0.95	0.95	1.14	0.94	0.95
18	0.88	0.87	0.95	0.95	1.12	0.93	0.95
19	0.88	0.87	0.95	0.95	1.10	0.92	0.95
20	0.88	0.87	0.95	0.95	1.09	0.91	0.95
21	0.88	0.87	0.94	0.95	1.07	0.91	0.95
22	0.88	0.86	0.92	0.95	1.05	0.91	0.95
23	0.88	0.86	0.91	0.96	1.04	0.90	0.96
24	0.88	0.86	0.91	0.96	1.03	0.90	0.96
25	0.88	0.86	0.91	0.96	1.03	0.90	0.96
26	0.88	0.85	0.91	0.98	1.03	0.90	0.98
27	0.88	0.85	0.91	0.98	1.02	0.90	0.98
28	0.88	0.85	0.91	1.00	1.02	0.90	1.00
29	0.88	0.85	0.91	1.02	1.02	0.90	1.02
30	0.88	0.85	0.91	1.02	1.01	0.90	1.02
31	0.88	0.84	0.91	1.06	1.00	0.90	1.06
32	0.88	0.84	0.91	1.06	1.00	0.90	1.06
33	0.88	0.84	0.92	1.06	1.00	0.90	1.06
34	0.88	0.84	0.92	1.07	1.00	0.90	1.07
35	0.88	0.84	0.92	1.07	1.00	0.89	1.07
36	0.88	0.84	0.92	1.07	0.98	0.89	1.07

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<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	0.88	0.84	0.92	1.07	0.98	0.89	1.07
38	0.88	0.85	0.92	1.07	0.98	0.89	1.07
39	0.88	0.85	0.92	1.10	0.96	0.89	1.10
40	0.88	0.85	0.92	1.10	0.96	0.89	1.10
41	0.88	0.85	0.92	1.10	0.96	0.89	1.10
42	0.88	0.85	0.92	1.11	0.94	0.89	1.11
43	0.89	0.85	0.92	1.12	0.94	0.89	1.12
44	0.89	0.85	0.92	1.12	0.94	0.89	1.12
45	0.89	0.85	0.92	1.12	0.92	0.89	1.12
46	0.90	0.85	0.93	1.12	0.92	0.89	1.12
47	0.92	0.85	0.93	1.12	0.92	0.89	1.12
48	0.93	0.86	0.93	1.12	0.91	0.89	1.12
49	0.94	0.88	0.93	1.12	0.91	0.91	1.12
50	0.94	0.89	0.94	1.12	0.91	0.91	1.12
51	0.95	0.91	0.94	1.12	0.91	0.92	1.12
52	0.96	0.93	0.95	1.12	0.89	0.93	1.12
53	0.99	0.94	0.95	1.12	0.89	0.94	1.12
54	1.02	0.96	0.96	1.12	0.89	0.94	1.12
55	1.03	0.99	0.97	1.12	0.89	0.95	1.12
56	1.06	1.02	1.01	1.13	0.86	0.97	1.13
57	1.09	1.04	1.05	1.13	0.86	0.99	1.13
58	1.12	1.07	1.08	1.13	0.86	1.01	1.13
59	1.14	1.10	1.13	1.13	0.86	1.04	1.13
60	1.19	1.13	1.16	1.13	0.86	1.07	1.13
61	1.22	1.18	1.19	1.13	0.86	1.11	1.13
62	1.26	1.19	1.21	1.13	0.86	1.15	1.13
63	1.30	1.20	1.27	1.13	0.86	1.19	1.13
64	1.33	1.25	1.31	1.13	0.86	1.20	1.13
65	1.37	1.30	1.31	1.13	0.86	1.22	1.13
66	1.40	1.33	1.31	1.13	0.86	1.22	1.13
67	1.43	1.35	1.31	1.13	0.86	1.24	1.13
68	1.46	1.36	1.31	1.13	0.86	1.25	1.13
69	1.48	1.37	1.31	1.13	0.86	1.25	1.13
70	1.50	1.41	1.31	1.13	0.86	1.27	1.13
71	1.52	1.42	1.31	1.13	0.86	1.29	1.13
72+	1.53	1.45	1.31	1.19	0.86	1.33	1.19
Excess Vehicle	0.80	0.80	0.80	0.70	0.95	0.90	0.70

29. For the Bodily Injury coverage (shown as “BI”) on the chart above, a policyholder with 0 years driving experience is assigned the relativity of 2.01, whereas a policyholder with 35 years driving experience receives a relativity of 0.88, and a policyholder with 9 years driving experience is assigned a relativity of 1.01.

30. With all else being equal, the policyholder with 0 years driving experience is the generally riskiest of the three to insure. Therefore, to account for that increased

1 risk, his or her BI base rate for the years driving experience factor will be multiplied by
2 2.01—essentially doubling the base rate.

3 31. Next, with all else being equal, the policyholder with 35 years driving
4 experience is the least risky of the three to insure. Therefore, to account for that lower
5 risk, his or her BI base rate for the years driving experience factor will be multiplied by
6 0.88—essentially a 12% discount from the base rate.

7 32. Finally, with all else still being equal, the policyholder with 9 years
8 driving experience reflects an average amount of risk (compared to the entire pool of
9 United Services’s policyholders). Therefore, to account for an average risk, his or her
10 BI base rate for the years driving experience factor will be multiplied by 1.01—
11 essentially the same as the base rate.

12 33. In Paragraph 14 of Jonathan Griglack’s declaration submitted in this case,
13 he states that seven rating factors have relativities that differ between United Services
14 and GIC throughout the relevant period. That is not accurate for rates in effect from
15 January 1, 2017 to December 27, 2017. During that period, the relativities associated
16 with extended non-owned auto property damage, multi-policy discount, and multiple
17 vehicle discount also differed between United Services and GIC. There is also no
18 guarantee that the seven relativities that Mr. Griglack identified would remain the only
19 seven differences in the future.

20 34. Under Proposition 103, the CDI must review and approve any changes to
21 a company’s relativities for any particular coverage before such changes can go into
22 effect.

23 35. Just like with base rates, relativities in both United Services and GIC have
24 changed over time. The CDI has reviewed and approved those changes at all relevant
25 times.

26 36. Since January 1, 2017, relativities for both companies were changed on
27 the following dates:

- 28 • 12/28/2017

- 2/12/2020
- 2022-07-25 (not yet effective)

C. The Difference Between Quoted Premium and the Amount of Premium Actually Paid by a Policyholder

37. I understand that Mr. Griglack is attempting to calculate premiums for all California GIC policyholders at ten different points in time between 2017 and 2021. It is certainly possible to perform these calculations if one has all the relevant data for each policyholder—although, to do it accurately, one would need to perform these calculations on an individual policyholder-by-policyholder basis.

38. Assuming Mr. Griglack’s calculations are accurate, he will be able to show—on ten specific dates—the quoted annual GIC premium for each policyholder as of that specific date. But the quoted annual premium on any given date can be different from the actual amount of premium that a policyholder ends up paying over the course of the next 365 days.

39. An important piece of information to note is that the start date of a policyholder’s policy period will likely be different for each policyholder. Thus, with exceptions, the ten dates that Mr. Griglack is using for his calculations will not align with the start date for any particular class member’s policy period.

40. But more importantly, insureds can and do make many changes to their policies during an annual or six-month policy period—these changes can and do have significant impacts on the amount of premium that an insured ends up paying over that annual or six-month period. Hypothetically, if USAA quotes a policyholder a \$500 premium at the start of a six-month policy period, the amount of premium that policyholder actually ends up paying over the next six months could end up being far less, or far more, than \$500.

41. Some common examples of changes that policyholders make during a six-month policy period—which would cause the quoted premium at the start of the policy period to be different from the actual amount of premium they end up paying over the

1 course of that six-month policy period—include adding or removing a vehicle from the
2 policy, adding or removing an optional coverage, adding or removing a driver,
3 changing coverage limits or deductibles, changing the “principally garaged” location,
4 an update to the estimation of annual miles driven, or a change in marital status.

5 42. In short, an individual’s *quoted* six-month premium on October 1, 2019—
6 which is all that Mr. Griglack is attempting to calculate—does not necessarily reflect
7 what their *actual* out-of-pocket premium cost would have been for the six-month
8 period between October 1, 2019, and March 31, 2019. Indeed, the two numbers can
9 and often are markedly different.

10 43. Determining the amount of premium a policyholder would *actually* pay
11 over any specific period of time in a hypothetical situation—such as the period
12 between October 1, 2019 and March 31, 2019—would be a challenging exercise with
13 the potential for human error. For one thing, as mentioned above, policyholders
14 generally have six-month policy periods that start throughout the year—it would be
15 sheer coincidence if a policyholder’s six-month policy period happened to be October
16 1, 2019 and March 31, 2019. So one would need to determine a policyholder’s actual
17 policy period(s) and then analyze any changes in their premiums that might have
18 occurred during the policy period, which would fall during the period between October
19 1, 2019 and March 31, 2019. Beyond that, USAA’s internal records and databases do
20 not readily allow us to calculate the actual amount of premium collected from any
21 given policyholder between two specific dates when those dates do not correspond to
22 the policyholder’s actual policy period. Therefore, the calculation would need to be
23 done manually, on a pro rata basis. In addition, because many policyholders have
24 multiple policies with USAA that are billed and paid together—such as auto insurance
25 and renters’ insurance—there would need to be additional calculations to determine
26 what portion of any premium payment is attributable to auto insurance and what
27 portion is attributable to other products.

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D. Plaintiffs' GIC Premium Spreadsheet

44. Since approximately February 2022, I have supervised the extensive effort now being undertaken by USAA to create a spreadsheet showing—for all California GIC insureds as of September 30, 2019—their annual premiums, coverages, and policy information necessary to determine their rate relativities.

45. I understand that this effort began in approximately December 2021, in response to Plaintiffs' discovery requests in this case. And it followed several discussions between Plaintiffs' counsel and USAA's counsel in an effort to identify the particular data that Plaintiffs believed they needed, in the format in which they believed they needed it.

46. Creating this spreadsheet has been a massive undertaking. USAA has never before attempted to undertake such an exercise—and we would never do so in the ordinary course of business. Instead, this exercise is being done solely to address the unique demands made by Plaintiffs in this case.

47. USAA does not have a system in place that would have allowed us to quickly and accurately provide the information that Plaintiffs wanted. Therefore, USAA had to create a brand-new process that would allow us to extract massive amounts of policyholder-specific data from approximately 65 separate tables across USAA's database, to populate approximately 255,000 rows (reflecting approximately 255,000 vehicles and 150,000 policyholders) and approximately 57 columns in the spreadsheet. And because this is such a unique exercise, we had to build this process from the ground up.

48. It took several weeks of brainstorming and coordination to begin designing a process that could give Plaintiffs the information they had requested as well as ensure its accuracy, and it then took several more weeks to identify the specific locations, fields, and formats for the data that would need to be included. Since approximately December 2021, we have created numerous iterations of the spreadsheet. Each one improves considerably in terms of accuracy and completeness.

1 49. After producing the first iteration of the spreadsheet to Plaintiffs on an
2 interim basis in February 2022, we have received feedback from Plaintiffs’ counsel
3 and have attempted to incorporate that feedback and address their concerns in the
4 subsequent iterations of the spreadsheet. In addition to producing the spreadsheet, I
5 and others at USAA have also independently reviewed each iteration of the
6 spreadsheet for data validation and quality control purposes.

7 50. The current iteration of the spreadsheet includes over 14.5 million
8 individual data elements. This iteration is for a single point in time and will need to be
9 recreated for the nine additional dates requested.

10 51. Collectively, I estimate that between December 2021 and today, USAA’s
11 employees have spent at least 350 hours working on designing, creating, and refining
12 the spreadsheet. This process has required the input and collaboration of at least 25
13 USAA employees, across five separate departments. I personally have attended
14 approximately 35 meetings and dedicated approximately 100 hours to this project—
15 including validating the data in the various iterations of the spreadsheet.

16 52. Since I began supervising this effort in February 2022, I have been
17 pushing myself and others at USAA to go as quickly as possible without sacrificing
18 quality or accuracy. I don’t believe that we could have gone any faster under the
19 circumstances. Notably, those circumstances include current IT and business efforts to
20 migrate our current rating engine, policy system, and pricing analytic platform to a
21 new environment in addition to continue to meet our standard business needs.

22 **E. Mr. Schwartz’s Damage Calculation**

23 53. I understand that Allan Schwartz is attempting to estimate a damage
24 calculation for this case. However, based on my training and experience as an actuary,
25 I believe there are significant flaws in the two methods Mr. Schwartz proposes in his
26 declaration for how this may be accomplished.

27 54. The first method he suggests is to use the current United Services rates for
28 GIC policyholders. The CDI would not allow this. The CDI requires company

1 placement to be objective and mutually exclusive. In other words, a policyholder that
2 is eligible to be written into GIC cannot also be eligible to be written into United
3 Services.

4 55. In addition, insurance rates and rating factors must be actuarially sound
5 and determined in accordance with the Actuarial Standards of Practice. Because the
6 rates and rate relativities for use in the United Services company were determined
7 using the historic United Services book of business, they would not necessarily be
8 considered actuarially appropriate for use for the GIC book based on the Actuarial
9 Standards of Practice.

10 56. In Mr. Schwartz's second method, he seems to suggest that USAA could
11 combine the entire United Services book of business with only a portion of the GIC
12 book of business to arrive at a combined premium. Seemingly, this means that Mr.
13 Schwartz would take the portion of GIC policyholders that would have a lower
14 premium in the United Services company (based on his and Mr. Griglack's
15 calculations) and move them into the United Services company. This would not be
16 possible. First, company placement must be determined before premium calculation.
17 And second, I've explained above that premium calculations for a single policyholder
18 can vary day-to-day, so a policyholder with a lower United Services premium today
19 (under Mr. Schwartz's and Mr. Griglack's methodology) would not necessarily
20 continue to have a lower premium under the United Services rate plan in the future.

21 57. If USAA were no longer allowed to write members separately into the
22 United Services and GIC companies, USAA would determine rates and rate relativities
23 by combining these books of business into a single company. The final rates and rate
24 relativities would depend on the projected losses from both books combined and could
25 not be known until the GLM and sequential analysis as prescribed by the CDI had been
26 performed.

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I declare under the penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct, and that I executed this Declaration on May 27, 2022, in Natick, Massachusetts.



Quinn Saner

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<u>Exhibit</u>	<u>Document Name</u>	<u>Pages</u>
A	USAA’s California Auto Rate Filing Effective as of August 1, 2019	17-335

EXHIBIT A

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Filing at a Glance

Company: United Services Automobile Association
Product Name: AUTO
State: California
TOI: 19.0 Personal Auto
Sub-TOI: 19.0001 Private Passenger Auto (PPA)
Filing Type: Rate
Date Submitted: 12/27/2018
SERFF Tr Num: USAA-131769162
SERFF Status: Closed-Approved
State Tr Num: 19-14
State Status: Approved
Co Tr Num: CA1802478
Effective Date: 10/01/2019
Requested (New):
Effective Date: 10/01/2019
Requested (Renewal):
Author(s): Frank Lugo, Ruben Rodriguez, George Satchell, Kevin Rasnake
Reviewer(s): Edward Cimini (primary), Mely Salazar
Disposition Date: 05/22/2019
Disposition Status: Approved
Effective Date (New): 05/22/2019
Effective Date (Renewal): 05/22/2019

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

General Information

Project Name: Status of Filing in Domicile:
Project Number: Domicile Status Comments:
Reference Organization: Reference Number:
Reference Title: Advisory Org. Circular:
Filing Status Changed: 05/23/2019
State Status Changed: 05/23/2019 **Deemer Date:** 03/05/2019
Created By: George Satchell **Submitted By:** George Satchell
Corresponding Filing Tracking Number:

Filing Description:

Based on a review of our latest automobile experience in California, we hereby file an overall rate level change of 1.5% for USAA to become effective October 1, 2019 for new and renewal business.

Included in this filing are the state required forms and exhibits, as well as the Rules and Underwriting Manual

Company and Contact

Filing Contact Information

George Satchell, Business Support Analyst GEORGE.SATCHELL@usaa.com
9800 Fredericksburg Road 210-790-9214 [Phone]
San Antonio, TX 78288

Filing Company Information

United Services Automobile Association
9800 Federicksburg Road
San Antonio, TX 78288
(800) 531-8722 ext. [Phone]
CoCode: 25941
Group Code: 200
Group Name: USAA
FEIN Number: 74-0959140
State of Domicile: Texas
Company Type: Reciprocal
State ID Number:

Filing Fees

Fee Required? No
Retaliatory? No
Fee Explanation:

State Specific

Variance Requested? (Yes/No): NO

State: California Filing Company: United Services Automobile Association
 TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
 Product Name: AUTO
 Project Name/Number: /

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Mely Salazar	05/23/2019	05/23/2019

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending company response	Edward Cimini	04/03/2019	04/03/2019
Respond immediately	Mely Salazar	02/28/2019	02/28/2019
Respond immediately	Mely Salazar	01/30/2019	01/30/2019

Response Letters

Responded By	Created On	Date Submitted
George Satchell	04/17/2019	04/17/2019
George Satchell	03/01/2019	03/01/2019
George Satchell	01/31/2019	01/31/2019

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Supporting Document	COMPANY OF PLACEMENT GUIDELINES	George Satchell	02/22/2019	02/22/2019

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
CHANGE EFFECTIVE DATE	Note To Reviewer	George Satchell	05/29/2019	05/29/2019

State: California Filing Company: United Services Automobile Association
 TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
 Product Name: AUTO
 Project Name/Number: /

Disposition

Disposition Date: 05/22/2019
 Effective Date (New): 05/22/2019
 Effective Date (Renewal): 05/22/2019
 Status: Approved

Comment:

The Company has submitted a Private Passenger Auto application for approval. The application set forth above is approved. Only the change(s) specifically indicated in the application set forth above, as it may have been amended, is (are) approved. Nothing in this letter shall constitute approval of any other application, whether incorporated by reference, or filed prior or subsequent to the application set forth above. The Company shall begin issuing policies pursuant to this approval within 90 days of the date of this approval, provided that the insurer is licensed in California to transact the line of insurance for which the approval is given. The Company may implement this approval earlier if it is able to do so. Regardless of the implementation date, the Company shall implement this approval with the same effective date for both new and renewal business and shall offer this product to all eligible applicants as of the implementation date. This approval shall continue to have full force and effect until such time as a subsequent change for the referenced lines or programs may be approved or ordered by the Insurance Commissioner.

If any portion of the application or related documentation conflicts with California law, that portion is specifically not approved. This approval does not constitute an approval of underwriting guidelines nor the specific language, coverages, terms, covenants and conditions contained in any forms, or of the forms themselves. Policy forms and underwriting guidelines included in this filing were reviewed only insofar as they relate to rates contained in this filing or currently on file with the California Department of Insurance. Any subsequent changes to underwriting guidelines or coverages, terms, covenants and conditions contained in any forms must be submitted with supporting documentation when those changes result in any rating impact. The Commissioner may at any time take any action allowed by law if he determines that any underwriting guidelines, forms or procedures for application of rates, or any other portions of the application conflict with any applicable laws or regulations.

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
United Services Automobile Association	%	1.500%				%	%

Schedule	Schedule Item	Schedule Item Status	Public Access
CONFIDENTIAL Supporting Document	Class Plan Application Exhibit A 21		Yes

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document (revised)	New Prior Approval Rate Application		Yes
Supporting Document	New Prior Approval Rate Application		Yes
Supporting Document	COMPANY OF PLACEMENT GUIDELINES		Yes
Supporting Document	Deemer Waiver		Yes
Supporting Document	040319 OBJECTION RESPONSE		Yes

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Objection Letter

Objection Letter Status	Pending company response
Objection Letter Date	04/03/2019
Submitted Date	04/03/2019
Respond By Date	04/18/2019

Dear George Satchell,

Introduction:

In order to assist me with the review of this filing and the other two PPA rate filings for USAA Casualty (State Tracking Number 19-15) and Garrison (State Tracking Number 19-13), please respond to the following questions:

1. In your prior PPA rate filing for USAA (State Tracking Number 16-5327), you indicated that 100% of your business was acquired through the Direct distribution channel. In this filing, you have indicated that 78% of your business is now associated with the Captive Agent marketing system and only 22% is associated with the Direct marketing system. This is obviously a major change with significant impact on the calculated rate indications.

a. Please explain why the marketing distribution percentages were changed. Is your company marketing its business differently today? Describe how your business is marketed through each of the distribution channels. Has the company's basic sales and marketing structure changed?

b. Does a licensed agent interact with the prospective policyholder during the sale of the PPA product, regardless of distribution channel? Are agents used to sell and service business in each of the distribution channels? How are the agents compensated? To what extent are in-house employees (who may not receive commissions) used to sell and service business in each distribution channel?

c. According to the data reported to the California Department of Insurance in our most recent (2017) Marketing System Survey, your company's expenses (as a percentage of earned premium) under each expense category do not differ by distribution channel. For example, your Other Acquisition expense percentage of 7.69% is the same for both the Captive and Direct channels. Please explain how the expense percentages were derived. Is any recognition being given to the actual expenses associated with the different marketing systems?

2. You have prepared separate rate indications for the towing and rental reimbursement lines. Please identify the other ancillary physical damage coverages which you offer. How were their rate requirements addressed in your filing? Did you include the premium and loss data for the remaining physical damage coverages in your collision or comprehensive rate indications?

3. Please provide at least three examples of your company's advertising by category (i.e., institutional vs. non-institutional).

If I have any additional questions, I will try to send them to you in the next 10 working days. If you need clarification on any of my questions, or if you need additional time to respond, please do not hesitate to contact me at 213-346-6781.

Thank you.

Edward D. Cimini, Jr., ACAS, MAAA
Senior Casualty Actuary
California Department of Insurance

Conclusion:

Sincerely,
Edward Cimini

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Objection Letter

Objection Letter Status	Respond immediately
Objection Letter Date	02/28/2019
Submitted Date	02/28/2019
Respond By Date	03/01/2019

Dear George Satchell,

Introduction:

Our records indicate that the deemer date for this filing is March 05,2019. In order for us to complete our review, we request a waiver of the deemer.

We ask that UNITED SERVICES AUTOMOBILE ASSOCIATION submits a SERFF note with the wording below to waive the deemer provisions:

Regarding the above-referenced rate application, UNITED SERVICES AUTOMOBILE ASSOCIATION ("applicant") hereby waives all deemer provisions of California Insurance Code Section 1861.05, specifically, the 60-day deemer and the 180-day deemer. If the applicant wishes to reactivate the deemer provisions, the applicant will make its request in writing to the Department of Insurance Rate Filing Bureau, San Francisco, California. Upon reactivation, the 60-day deemer will resume five days after the Department's receipt of the applicant's request to reactivate the deemer, on day 55, and the 180-day deemer will resume five days after the Department's receipt of the applicant's request to reactivate the deemer, on day 63.

Conclusion:

Sincerely,
Mely Salazar

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Objection Letter

Objection Letter Status	Respond immediately
Objection Letter Date	01/30/2019
Submitted Date	01/30/2019
Respond By Date	02/01/2019

Dear George Satchell,

Introduction:

SVO Identified Funds, Cash, and Other do not match with the figures in the annual statement (NAIC code 2003, United Serv Automobile Assn & Affil). Please amend item 9.7 of the Projected Yield and FIT on Investment Income page.

Your prompt attention will be greatly appreciated.

Conclusion:

Sincerely,
Mely Salazar

State: California Filing Company: United Services Automobile Association
 TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
 Product Name: AUTO
 Project Name/Number: /

Response Letter

Response Letter Status Submitted to State
 Response Letter Date 04/17/2019
 Submitted Date 04/17/2019

Dear Edward Cimini,

Introduction:

Response 1

Comments:

Attached please find our response.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	040319 OBJECTION RESPONSE
Comments:	
Attachment(s):	CDI Objection Response_April 16th, 2019.pdf Institutional #1.pdf Institutional #2.pdf Non-Institutional Examples.pdf Institutional #3.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,
 George Satchell

State: California Filing Company: United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Response Letter

Response Letter Status Submitted to State
Response Letter Date 03/01/2019
Submitted Date 03/01/2019

Dear Edward Cimini,

Introduction:

Response 1

Comments:

Please see attached.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Deemer Waiver
Comments:	
Attachment(s):	Deemer Waiver.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,
George Satchell

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Response Letter

Response Letter Status Submitted to State
Response Letter Date 01/31/2019
Submitted Date 01/31/2019

Dear Edward Cimini,

Introduction:

Response 1

Comments:

Please see attached revised Prior Approval Template

Changed Items:

State: California Filing Company: United Services Automobile Association
 TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
 Product Name: AUTO
 Project Name/Number: /

Supporting Document Schedule Item Changes

Satisfied - Item: New Prior Approval Rate Application

Comments:

Attachment(s):
 USAA_Prior_Approval_Application.pdf
 USAA_Prior_Approval_Application.xlsm
 Filing Memorandum_USAA.pdf
 2019-10-01 CA BRM.pdf
 CA Rules Manual.pdf
 Exhibit 1 Filing History.pdf
 Exhibit 2 Rate Level History.pdf
 Exhibit 3 Policy Term Distribution.pdf
 Exhibit 4 Premium Adjustment Factor.pdf
 Exhibit 9 Catastrophe Adjustment Methodology.pdf
 USAA_Standard Exhibits_5_7.pdf
 USAA_Standard Exhibits_8.pdf
 USAA_Standard Exhibits_5_7_8.xlsm
 Exhibit 9 Catastrophe Adjustment.xlsx
 Exhibit 19 Rental Reimbursement Relativities.xlsx
 Exhibit 10 Credibility.xlsx
 Exhibit 15 Rate Classification.pdf
 Exhibit 16 New Program.pdf
 Exhibit 17 Super Group.pdf
 Exhibit 18 Rules and Underwriting Guidelines.pdf
 Exhibit 11 Ancillary Income.xlsx
 Exhibit 12 Reinsurance.pdf
 Exhibit 13 Variance Request.pdf
 Exhibit 14 Rate Distribution.xlsx
 Exhibit 20 Customer Dislocation.xlsx
 USAA_Prior_Approval_Template.pdf
 USAA_Prior_Approval_Template.xlsm

Previous Version

Satisfied - Item: *New Prior Approval Rate Application*

Comments:

Attachment(s):
USAA_Prior_Approval_Application.pdf
USAA_Prior_Approval_Application.xlsm
USAA_Prior_Approval_Template.pdf
USAA_Prior_Approval_Template.xlsm
Filing Memorandum_USAA.pdf
2019-10-01 CA BRM.pdf
CA Rules Manual.pdf
Exhibit 1 Filing History.pdf
Exhibit 2 Rate Level History.pdf
Exhibit 3 Policy Term Distribution.pdf
Exhibit 4 Premium Adjustment Factor.pdf
 Exhibit A

CONFIDENTIAL

State: California Filing Company: United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

- USAA_Standard Exhibits_5_7.pdf*
- USAA_Standard Exhibits_8.pdf*
- USAA_Standard Exhibits_5_7_8.xlsm*
- Exhibit 9 Catastrophe Adjustment Methodology.pdf*
- Exhibit 9 Catastrophe Adjustment.xlsx*
- Exhibit 10 Credibility.xlsx*
- Exhibit 15 Rate Classification.pdf*
- Exhibit 16 New Program.pdf*
- Exhibit 17 Super Group.pdf*
- Exhibit 18 Rules and Underwriting Guidelines.pdf*
- Exhibit 19 Rental Reimbursement Relativities.xlsx*
- Exhibit 11 Ancillary Income.xlsx*
- Exhibit 12 Reinsurance.pdf*
- Exhibit 13 Variance Request.pdf*
- Exhibit 14 Rate Distribution.xlsx*
- Exhibit 20 Customer Dislocation.xlsx*

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,
George Satchell

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Amendment Letter

Submitted Date: 02/22/2019

Comments:
 Amending filing to add company of placement guidelines.

Changed Items:
No Form Schedule Items Changed.

No Rate Schedule Items Changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	COMPANY OF PLACEMENT GUIDELINES
Comments:	
Attachment(s):	November 2016 CA Auto CoP Rules_filed.pdf 02 15 19 Redlined_CA Auto CoP RULES_approved by Elig and PnC legal.pdf 02 15 19 FINAL_CA Auto CoP Rules_approved by Elig and PnC legal.pdf

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Note To Reviewer

Created By:

George Satchell on 05/29/2019 10:26 AM

Last Edited By:

George Satchell

Submitted On:

05/29/2019 10:26 AM

Subject:

CHANGE EFFECTIVE DATE

Comments:

Hi Mely,

We would like change the effective date to 08/01/19.

Thanks

George

State: California Filing Company: United Services Automobile Association
 TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
 Product Name: AUTO
 Project Name/Number: /

Supporting Document Schedules

Bypassed - Item:	Class Plan Application
Bypass Reason:	Rate filing only.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	New Prior Approval Rate Application
Comments:	
Attachment(s):	USAA_Prior_Approval_Application.pdf USAA_Prior_Approval_Application.xlsm Filing Memorandum_USAA.pdf 2019-10-01 CA BRM.pdf CA Rules Manual.pdf Exhibit 1 Filing History.pdf Exhibit 2 Rate Level History.pdf Exhibit 3 Policy Term Distribution.pdf Exhibit 4 Premium Adjustment Factor.pdf Exhibit 9 Catastrophe Adjustment Methodology.pdf USAA_Standard Exhibits_5_7.pdf USAA_Standard Exhibits_8.pdf USAA_Standard Exhibits_5_7_8.xlsm Exhibit 9 Catastrophe Adjustment.xlsx Exhibit 19 Rental Reimbursement Relativities.xlsx Exhibit 10 Credibility.xlsx Exhibit 15 Rate Classification.pdf Exhibit 16 New Program.pdf Exhibit 17 Super Group.pdf Exhibit 18 Rules and Underwriting Guidelines.pdf Exhibit 11 Ancillary Income.xlsx Exhibit 12 Reinsurance.pdf Exhibit 13 Variance Request.pdf Exhibit 14 Rate Distribution.xlsx Exhibit 20 Customer Dislocation.xlsx USAA_Prior_Approval_Template.pdf USAA_Prior_Approval_Template.xlsm
Item Status:	
Status Date:	

Satisfied - Item:	COMPANY OF PLACEMENT GUIDELINES
Comments:	

CONFIDENTIAL

Exhibit A
33

State: California Filing Company: United Services Automobile Association
 TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
 Product Name: AUTO
 Project Name/Number: /

Attachment(s):	November 2016 CA Auto CoP Rules_filed.pdf 02 15 19 Redlined_CA Auto CoP RULES_approved by Elig and PnC legal.pdf 02 15 19 FINAL_CA Auto CoP Rules_approved by Elig and PnC legal.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Deemer Waiver
Comments:	
Attachment(s):	Deemer Waiver.pdf
Item Status:	
Status Date:	

Satisfied - Item:	040319 OBJECTION RESPONSE
Comments:	
Attachment(s):	CDI Objection Response_April 16th, 2019.pdf Institutional #1.pdf Institutional #2.pdf Non-Institutional Examples.pdf Institutional #3.pdf
Item Status:	
Status Date:	

State: California **Filing Company:** United Services Automobile Association
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: AUTO
Project Name/Number: /

Attachment USAA_Prior_Approval_Application.xlsm is not a PDF document and cannot be reproduced here.

Attachment USAA_Standard Exhibits_5_7_8.xlsm is not a PDF document and cannot be reproduced here.

Attachment Exhibit 9 Catastrophe Adjustment.xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibit 19 Rental Reimbursement Relativities.xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibit 10 Credibility.xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibit 11 Ancillary Income.xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibit 14 Rate Distribution.xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibit 20 Customer Dislocation.xlsx is not a PDF document and cannot be reproduced here.

Attachment USAA_Prior_Approval_Template.xlsm is not a PDF document and cannot be reproduced here.

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

PRIOR APPROVAL RATE APPLICATION FOR PROPERTY & LIABILITY LINES GENERAL INFORMATION

Completed by: Date:

Your File #:
(15 Character Maximum)

Filing Characteristics

Does this filing include a variance request? (Page 11 hidden)

If yes,

Is this a variance request submitted after the prior approval application to which it applies?

Provide the applicable CDI File #:

Does this file contain group data? If yes, complete Page 2. (Page 2 hidden)

Is this a specialty filing?

Line Type:

General Line :

Subline:

Program:

Provide the most recent applicable CDI file # in this line, subline and/or program:

DEPARTMENT USE ONLY

CDI File #: _____

SERFF #: _____

Filed Date: _____

Compliance Date: _____

Public Notice Date: _____

Deemer Date: _____

Intake Analyst: _____

Bureau/Senior: _____

Group Filing?: Yes No

X-Reference #: _____

Filing Type: Rate Rule
 Form Variance
 New Program

% Change: _____

Company Information

Company Name:

Group Name:

NAIC Company Code:

NAIC Group Code:

Organized under the laws of the State of:

Home Office:

Contact Name/Title:

Toll Free Phone #: Fax #:

Email Address:

Mailing Address:

I declare under penalty of perjury under the laws of the State of California, that the information filed is true, complete, and correct, and that price optimization methods or models have not been used in the development of the final rates for any segment of the filed rating plan.

Authorized Signature

Date of Filing

Telephone #

Refer to CDI website below for the most current rate template and prior approval factors:

<http://www.insurance.ca.gov/0250-insurers/0800-rate-filings/>

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

FILING TYPE

The purpose of this filing is (check all that apply):

Type of Filing		Required Documentation ^{1,2,3}
<input type="checkbox"/>	New Program (Includes adoption of advisory organization loss costs, forms and rules.)	Pages 1 through 4, 8 through 10 & 12, Exhibit 16 plus Prior Approval Rate Template
<input checked="" type="checkbox"/>	Rates (Includes adoption of advisory organization loss costs.)	
	<input checked="" type="checkbox"/> Rate increase	Pages 1 through 8 & 12, Exhibits 1-17 & 20, plus Prior Approval Rate Template
	<input type="checkbox"/> Rate decrease	Pages 1 through 8 & 12, Exhibits 1-17 & 20, plus Prior Approval Rate Template
	<input type="checkbox"/> Revenue-neutral change (zero percent overall impact)	Pages 1 through 8 & 12, Exhibits 1-17 & 20, plus Prior Approval Rate Template
<input type="checkbox"/>	Variance Request	
	<input type="checkbox"/> Filed together with the prior approval application to which it applies.	Page 11, Exhibit 13 plus Prior Approval Rate Template
	<input type="checkbox"/> Filed after the prior approval application to which it applies.	Pages 1 through 4, 11 & 12, Exhibit 13 plus Prior Approval Rate Template
<input type="checkbox"/>	Coverage Forms (Includes adoption of advisory organization forms.)	
	<input type="checkbox"/> With rate impact	Pages 1 through 9 & 12, Exhibits 1-17 & 20 plus Prior Approval Rate Template
	<input type="checkbox"/> Without rate impact	Pages 1 through 4, 9 & 12
<input type="checkbox"/>	Rules and Underwriting Guidelines (Includes adoption of advisory organization rules.)	
	<input type="checkbox"/> With rate impact	Pages 1 through 8, 10 & 12, Exhibits 1-18 & 20 plus Prior Approval Rate Template
	<input type="checkbox"/> Without rate impact	Pages 1 through 4, 10 & 12 plus Exhibit 18

¹ Page numbers refer to pages of the Prior Approval Rate Application. Where Exhibits 5, 7 and 8 are required, applications must also include a completed Standard Exhibits Template. Exhibit 21 must be included for all Specialty filing applications.

² All Private Passenger Automobile class plans must be filed separately from the Prior Approval Rate Applications.

³ Page 6 of the Prior Approval Rate Application is required solely for insurers submitting filings for a subset of their Homeowners Multiple Peril line.

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

IMPACT OF PROPOSED CHANGES

Proposed Overall Rate Change:	1.5%
Proposed Earned Premium Per Exposure:	\$983.76
Proposed Effective Date:	10/01/19

	Coverage/Form ¹	Indicated % Change	Proposed % Change	Adjusted Earned Premium ^{2,3}	Projected Earned Premium ³
(1)	Bodily Injury	10.6%	0.0%	\$110,422,001	\$110,422,001
(2)	Property Damage	28.7%	12.0%	\$79,041,014	\$88,525,935
(3)	Medical Payments	6.7%	0.0%	\$8,583,204	\$8,583,204
(4)	Uninsured Motorists	23.9%	0.5%	\$28,214,287	\$28,355,358
(5)	Miscellaneous Liability (Extended Benefits)	-7.5%	-9.0%	\$710,716	\$646,751
(6)	Collision	1.7%	-4.2%	\$147,051,607	\$140,875,439
(7)	Comprehensive	10.2%	5.0%	\$28,366,312	\$29,784,628
(8)	TL	42.1%	17.9%	\$3,070,080	\$3,619,624
(9)	RR	25.1%	20.0%	\$5,440,839	\$6,529,007
(10)	WOCD	-20.6%	-21.5%	\$1,096,550	\$860,792
Total		12.0%	1.5%	\$411,996,610	\$418,202,740

¹ Commercial Auto Liability and Physical Damage must be combined in one application, with separate Rate Calculation pages in the Prior Approval Rate Template for liability and physical damage coverages.

² Adjusted earned premium is the historical earned premium for the most recent year adjusted to the current rate level and trended to the average earned date of the proposed rating period. These figures should reconcile to the Prior Approval Rate Template.

³ Total earned premium must include all income derived from miscellaneous fees and other charges.

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

RECONCILIATION OF DIRECT EARNED PREMIUM DATA
Annual Statement Statutory Page 14 Calendar Year Data

	Coverage/Form/Program ¹	Latest CDI Filing # ²	2nd Prior Calendar Year	1st Prior Calendar Year	Most Recent Calendar Year
			2015	2016	2017
(1)	Bodily Injury		83,690,343	84,420,649	85,444,416
(2)	Property Damage		60,490,970	61,010,635	61,759,853
(3)	Medical Payments		3,216,519	3,233,139	3,259,852
(4)	Uninsured Motorist		32,321,578	32,177,858	32,112,504
(5)	Extended Benefits		3,316,136	3,428,002	3,558,636
(6)	Collision + Waiver of Collision Deductible		132,305,576	139,075,791	146,692,392
(7)	Comprehensive		32,068,470	32,940,127	34,009,021
(8)	Towing and Labor		3,006,112	3,028,437	3,052,975
(9)	Rental Reimbursement		6,348,191	6,406,128	6,457,784
(10)					
Total			356,763,896	365,720,764	376,347,434
Statutory Page 14			356,763,896	365,720,764	376,347,434
Difference			(0)	0	(0)

Explain any differences:

¹ This exhibit requires insurers to itemize each program until **all** data is reconciled to the corresponding annual statement line of insurance.

² For residual market data, a filing number is not required.

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

ANNUAL STATEMENT LINE - Auto Liability and Physical Damage

	Year	Written Premium	Earned Premium	Incurred Loss	IL%	DCCE	DCCE%	IL+DCCE	IL+DCCE %
(1)	YYYY	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
(2)	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
(3)	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
(4)	3 Yr Avg	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!

#VALUE!

Note: Programs with less than \$25M in premium each can be combined into one entry.

Note: Ratios are weighted averages. Dollars are arithmetic averages.

Total - All Programs

	Year	Written Premium	Earned Premium	Incurred Loss	IL%	DCCE	DCCE%	IL+DCCE	IL+DCCE %
(5)	YYYY	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
(6)	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
(7)	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
(8)	3 Yr Avg	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!

Difference	-	-	-	#DIV/0!	-	#DIV/0!	-	#DIV/0!
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(specify program)

	Year	Written Premium	Earned Premium	Incurred Loss	IL%	DCCE	DCCE%	IL+DCCE	IL+DCCE %
	YYYY	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	3 Yr Avg	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!

(specify program)

	Year	Written Premium	Earned Premium	Incurred Loss	IL%	DCCE	DCCE%	IL+DCCE	IL+DCCE %
	YYYY	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	3 Yr Avg	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!

(specify program)

	Year	Written Premium	Earned Premium	Incurred Loss	IL%	DCCE	DCCE%	IL+DCCE	IL+DCCE %
	YYYY	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	3 Yr Avg	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!

(specify program)

	Year	Written Premium	Earned Premium	Incurred Loss	IL%	DCCE	DCCE%	IL+DCCE	IL+DCCE %
	YYYY	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	3 Yr Avg	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!

(specify program)

	Year	Written Premium	Earned Premium	Incurred Loss	IL%	DCCE	DCCE%	IL+DCCE	IL+DCCE %
	YYYY	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	#VALUE!	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!
	3 Yr Avg	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

ADDITIONAL CALENDAR YEAR DATA REQUIRED BY STATUTE

Refer to CIC §1857.7, CIC §1857.9 and CIC §1864 for more information.

Line	Type of Data	Most Recent Calendar Year
(0)	Calendar Year	2017
(1)	Number of claims outstanding at beginning of year	11,105
(2)	Number of claims during the year	119,539
(3)	Number of claims closed during the year	120,333
(4)	Number of claims outstanding at year's end [(1) + (2) - (3)]	10,311
(5)	Unearned Premiums	\$94,868,140
(6)	Dollar amount of claims paid	\$264,805,708
(7)	Net loss reserves for outstanding claims excluding claims incurred but not reported (case reserves)	\$67,897,785
(8)	Net loss reserves for claims incurred but not reported (IBNR)	\$112,662,342
(9)	Losses incurred as a percentage of premiums earned, including IBNR	70.6%
(10)	Net investment gain or loss and other income or gain or loss allocated to the line	\$95,484,000
(11)	Net income before federal and foreign income taxes [(10) + (15)]	\$127,855,655
(12)	Total number of policies in force on the last day of the reporting period	202,550
(13)	Total number of policies canceled	558
(14)	Total number of policies non-renewed	12,576
(15)	Net underwriting gain or loss (= CY earned premiums less CY incurred loss less CY incurred expense)	\$32,371,655
(16)	Separate allocations of expenses for:	
(17)	(a) commissions and brokerage expense	
(18)	(b) other acquisition costs	\$28,435,024
(19)	(c) general office expenses	\$2,497,906
(20)	(d) taxes, licenses and fees	\$6,997,918
(21)	(e) loss adjustment expense (DCCE & AOE)	\$40,411,547
(22)	(f) other expenses	

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

MISCELLANEOUS FEES AND OTHER CHARGES

Check all fees that apply and identify the amount charged for each transaction.

If no fees apply to this program, check here:

Miscellaneous Fees

	New Business	Renewal Business
Policy Fee	<input type="checkbox"/>	<input type="checkbox"/>
Installment Fee (Fixed \$)	<input type="checkbox"/>	<input type="checkbox"/>
Endorsement Fee	<input type="checkbox"/>	<input type="checkbox"/>
Inspection Fee	<input type="checkbox"/>	<input type="checkbox"/>
Cancellation Fee	<input type="checkbox"/>	<input type="checkbox"/>
Reinstatement Fee	<input type="checkbox"/>	<input type="checkbox"/>
Late Fee	<input checked="" type="checkbox"/> \$15.00	<input checked="" type="checkbox"/> \$15.00
SR-22	<input checked="" type="checkbox"/> \$25.00	<input checked="" type="checkbox"/> \$25.00
Other Fees (specify below)		
<i>Fee 1</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Fee 2</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Fee 3</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Fee 4</i>	<input type="checkbox"/>	<input type="checkbox"/>

Ancillary Income

	New Business	Renewal Business
Installment Finance Charge (APR %)	<input type="checkbox"/>	<input type="checkbox"/>
Non-Sufficient Funds (NSF) Fee	<input type="checkbox"/>	<input type="checkbox"/>
Membership Dues	<input type="checkbox"/>	<input type="checkbox"/>
Premium Finance Revenues	<input type="checkbox"/>	<input type="checkbox"/>
Other Fees (specify below)		
<i>Fee 1</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Fee 2</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Fee 3</i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Fee 4</i>	<input type="checkbox"/>	<input type="checkbox"/>

Use Exhibit 6 if additional space is needed to explain fees not listed above.

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

FORMS

		Applicable Form			Source of Form			Coverage Change Reflects		Coverage Change Includes		Factor or Charge (\$, % or Description)
		#	Title	Type	Source	CDI File # ¹	Category	Restriction? ²	Broadening?	Rate Impact?	% Impact	
(1)	Proposed											
	Current											
(2)	Proposed											
	Current											
(3)	Proposed											
	Current											
(4)	Proposed											
	Current											
(5)	Proposed											
	Current											

¹ If Source selected is ISO or Other Advisory Organization, provide the CDI File # of applicable filing from which the form is being adopted. If Source selected is Company and Category is Replacement, provide the CDI File # under which current form is approved.

² Forms that restrict, exclude or delete coverage require consideration of a rate offset/credit. Provide the amount of prior losses incurred associated with the impacted coverage, if any.

Legend of Response Codes

Type Code	Source Code	Category Code
(1) Application	(1) Insurance Services Organization (ISO)	(1) New, mandatory
(2) Endorsement	(2) Other Advisory Organization	(2) New, optional
(3) Policy	(3) Company	(3) Replacement, mandatory
(4) Other (Describe in filing memorandum)	(4) Other (Describe in filing memorandum)	(4) Replacement, optional
		(5) Withdrawn, mandatory
		(6) Withdrawn, optional

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

RULES AND UNDERWRITING GUIDELINES

Insurers submitting a rule change filing must provide the information identified below. Complete Exhibit 18 as necessary to fulfill this requirement.

Check all that apply:

- (1) Introducing a new rule(s)
- (2) Revising an existing rule(s)
- (3) Adopting an approved Advisory Organization (AO) rule(s)
- (4) Withdrawing an approved rule(s)
- (5) Introducing or revising an underwriting guideline(s)¹

If (1), (2) or (5) above is checked, provide the following:

- (a) The purpose for the rule or underwriting guideline or an explanation for revising an existing rule or underwriting guideline (Exhibit 18)
- (b) A copy of the current and proposed manual page corresponding to the rule or underwriting guideline
- (c) The proposed charge for the rule, and justification of the charge including the rate or premium development method (Exhibit 18)
- (d) The rate impact of the rule or underwriting guideline on the current book of business, with corresponding calculation of that impact (Exhibit 18)
- (e) Advise if the rule is:
 - (i) Optional
 - (ii) Mandatory

If (3) above is checked, specify the approved CDI File #(s) of the AO rule:

If (4) above is checked, provide the following:

- (a) An explanation for the withdrawal of the rule (Exhibit 18)
- (b) A copy of the current and proposed manual page corresponding to the withdrawn rule
- (c) The rate impact of withdrawing the rule on the current book of business, with corresponding calculation of that impact (Exhibit 18)

For all rule and underwriting guideline changes, provide any additional comments necessary to adequately explain the rule change (Exhibit 18).

¹ Underwriting guidelines included in this filing are reviewed only insofar as they relate to rates contained in this filing or currently on file with the California Department of Insurance.

State of California
Department of Insurance (CDI)

Company:
Line:

United Services Automobile Association
Auto Liability and Physical Damage

FILING CHECKLIST

Use this checklist to assemble a complete application:

Prior Approval Rate Application

- General Information, Page 1
- Insurer Group Information, Page 2
- Filing Type, Page 3
- Proposed Impact, Page 4
- Reconciliation of Direct Earned Premium to Statutory Data, Page 5
- Homeowners Form Detail (if applicable), Page 6
- Additional Calendar Year Data Required by Statute, Page 7
- Miscellaneous Fees and Other Charges, Page 8
- Forms, Page 9
- Rules and Underwriting Guidelines, Page 10
- Variance Request, Page 11
- Filing Checklist, Page 12

Filing Memorandum

Prior Approval Rate Template¹

Standard Exhibits Template¹

Printed Rate and Rule Manual Pages¹

Underwriting Guidelines¹

Forms^{1,2}

Copies of Reinsurance Agreements¹

Supporting Exhibits

- Exhibit 1 - Filing History
- Exhibit 2 - Rate Level History
- Exhibit 3 - Policy Term Distribution
- Exhibit 4 - Premium Adjustment Factor
- Exhibit 5 - Premium Trend Factor³
- Exhibit 6 - Miscellaneous Fees and Other Charges
- Exhibit 7 - Loss and Defense & Cost Containment Expense (DCCE) Development Factors³
- Exhibit 8 - Loss and DCCE Trend³
- Exhibit 9 - Catastrophe Adjustment
- Exhibit 10 - Credibility Adjustment
- Exhibit 11 - Ancillary Income
- Exhibit 12 - Reinsurance Premium and Recoverables
- Exhibit 13 - Variance Request
- Exhibit 14 - Rate Distribution
- Exhibit 15 - Rate Classification Relativities
- Exhibit 16 - New Program
- Exhibit 17 - Super Group Corporate Structure Verification (PPA only)
- Exhibit 18 - Rules and Underwriting Guidelines
- Exhibit 19 - Supplemental Information
- Exhibit 20 - Customer Dislocation
- Exhibit 21 - Insurer's Ratemaking Calculations for Specialty Filings

¹ See Prior Approval Rate Filing Instructions.

² Attach all independent forms and list all advisory organization forms.

³ Provide Standard Exhibits Template for these exhibits.

USAA
CALIFORNIA
FILING MEMORANDUM

Based on a review of our latest automobile experience in California, we hereby file an overall rate level change of 1.5% for USAA to become effective October 1, 2019 for new and renewal business.

Included in this filing are the state required forms and exhibits, as well as the Rules and Underwriting Manual.

Exhibit 1 Three-Year Filing History

This exhibit lists all rate, rule and form filings previously approved by the California Department of Insurance (CDI) within the last three years and our last approved rate filing.

Exhibit 2 Seven-Year Rate Level History

This exhibit lists the rate level changes of the last seven years.

Exhibit 3 Policy Term Distribution

This exhibit defines available policy term options.

Exhibit 4 Premium Adjustment Factor

This exhibit explains the premium adjustment factor calculation process to reflect the overall rate level revision of the company as provided on Exhibit 2.

Trend Selection Justification

Exhibit 5 Premium Trend

Standard Exhibit 5 displays our by-coverage premium trends selections. Written premiums are trended from March 30 of the accident year, the average written date during the experience period. Premiums are trended to July 1, 2019, the average written date for policies written under the proposed rate level, assuming an effective date of October 1, 2019. Written premium at present rates is determined using the same methodology outlined for earned premium in Exhibit 4.

Exhibit 8 Loss and DCCE Trend

Standard Exhibit 8 displays our by-coverage Loss and DCCE trends selections. Losses and DCCE are trended from March 30 of the accident year, the average date of loss. Losses and DCCE are trended to July 1, 2019, the average date of loss for policies written under the proposed rate level, assuming an effective date of October 1, 2019.

We selected closed claims per exposure for frequency and paid claims per exposure for severity.

We chose to use total paid claims since it was readily available and commonly used. Closed claims most closely

related to paid claims and thus were selected.

We used California FastTrack as the complement for coverages with less than full credibility. We used California FastTrack Bodily Injury data for Uninsured Motorist, Medical Payments, and Extended Benefits. We used California FastTrack Collision as the complement for Miscellaneous Physical Damage (Waiver of Collision deductible).

The exposure base for both premium trend and loss trend is earned car years.

In selecting the point fit that produces the most actuarially sound result we considered both loss trends and premium trend. We looked at the pure premium per exposure divided by premium per exposure for each quarter resulting in a loss ratio for each quarter. We then compared the resulting data to the 5 possible point fits (8, 12, 16, 20, and 24) allowed by Regulation 2644.7 and selected the most appropriate. For USAA we found that, with the exception of Medical Payments and Collision, longer tailed /more volatile coverages best fit with 16, and 20-point fits while shorter tailed/less volatile coverages best fit with 8 and 12 point fits

USAA Trend Selections	USAA
Bodily Injury	20-point
Property Damage	8-point
Medical Payments	12-point
Uninsured Motorists	20-point
Misc. Liability	20-point
Collision	16-point
Comprehensive	12-point
Towing and Labor	12-point
Rental Reimbursement	12-point
Waiver of Collision Deductible	12-point

Exhibit 6 Miscellaneous Fees and Other Charges

SR-22 fees and Late Fees are the only fees relevant to this exhibit.

Development of Ultimate Losses Justification

Exhibit 7 Loss and Defense and Cost Containment Expense (DCCE) Development Factors

Annual non-Catastrophe Incurred losses & DCCE Development and the resulting development triangle were selected (rather than paid) to project ultimate losses. Since there has not been a significant alteration in our case reserving practices, we used the incurred development approach because they develop faster and have less variation than the paid data. Therefore, we are able to get an appropriate estimate of ultimate claims at an earlier evaluation point. We have looked at paid loss development and see no compelling reason to change our standard method.

Exhibit 9 Catastrophe Adjustment

USAA defines catastrophe losses using the industry standard of \$25 Million in damage to insured losses for the industry. A PCS Cat code is assigned to each such event. For events that do not meet PCS guidelines, a catastrophe may also be declared internally if USAA incurs more than 1,000 claims or more than \$5,000,000 in

loss. These Cat codes are tracked on USAA's database for claims occurring due to such events.

The procedure consists of initially recording both the new paid catastrophe losses plus paid DCCE and the developed paid losses excluding catastrophe plus paid DCCE. The cat losses are then ratioed to the adjusted non-cat losses to arrive at a catastrophe adjustment factor. This procedure is done by accident year with the average cat adjustment factor being the mean of the yearly factors.

The data used and calculations are shown on Exhibit 9.

Exhibit 10 Credibility Adjustment

The exhibit provides data used to calculate experience period credibility, number of experience years to be used by coverage, and loss trend credibility.

Exhibit 11 Ancillary Income

Non-sufficient funds fees are the only fees relevant to this exhibit.

Exhibit 12 Reinsurance Premium and Recoverables

Reinsurance premium and recoverables are not being used in this filing.

Exhibit 13 Request for Variance

There is no variance request associated with this filing.

Exhibit 14 Rate Distribution

All coverages are individually shown in the prior approval template.

Exhibit 15 Rate Classifications

Not Applicable

Exhibit 16 New Program

Not Applicable

Exhibit 17 Super Group

Not Applicable

Exhibit 18 Rules and Underwriting Guidelines

There are no changes to the rules and underwriting guidelines.

Exhibit 19 Supplemental Information

Displays the current Rental Reimbursement rates, current/indicated/proposed relativities, and proposed Rental Reimbursement rates. The proposed rates for Rental Reimbursement were calculated by using the selected relativities and company-level rate changes. To obtain the indicated relativities, 2016 state-specific data was used to calculate the average severities by class.

Exhibit 20 Customer Dislocation

Displays customer dislocation in increments of 5%. There are no members that are expected to experience a rate increase of over 25% due to our coverage selections.

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **OCTOBER 1, 2019 (NEW BUSINESS)**
OCTOBER 1, 2019 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

BASE RATES AND EXPENSE FEES

Base Rates

<u>Coverages</u>	<u>Limits</u>	<u>USAA</u>	<u>CIC</u>	<u>GIC</u>	<u>Garrison</u>
BI	15/30	341.72	341.01	428.94	352.90
PD	5,000	390.29	382.33	432.51	421.28
MP	500	29.09	24.76	42.02	33.22
UMUIMBI	15/30	57.87	58.10	76.08	56.32
UMPD	3,500	39.65	39.34	50.38	36.52
CP	500 Ded	53.96	56.17	88.96	66.80
CL	500 Ded	354.35	361.25	584.69	395.15
RR*		*	*	*	*
T&L		17.34	21.33	20.60	24.48
WOCD	50 Ded	1.66	1.28	3.32	2.06

Stated Amount Factor

<u>Coverages</u>	<u>GROUP</u>
CP	0.015

Expense Fees

<u>Coverages</u>	<u>GROUP</u>
BI	22.50
PD	19.00
CP	7.75
CL	37.50

* See section R-2 for Rental Reimbursement base rates

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **OCTOBER 1, 2019 (NEW BUSINESS)**
OCTOBER 1, 2019 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

RATES

EB Rates

<u>Limit</u>	<u>USAA</u>	<u>CIC</u>	<u>GIC</u>	<u>Garrison</u>
0	3.09	3.82	6.20	4.77
500	4.64	5.77	9.30	7.15
1,000	6.19	7.63	12.40	9.53
2,000	6.92	8.90	14.50	11.12

RR Rates

<u>Class</u>	<u>USAA</u>	<u>CIC</u>	<u>GIC</u>	<u>Garrison</u>
Economy	37.10	37.99	54.00	48.16
Standard	41.11	42.26	59.00	53.55
Multi-passenger/truck	55.52	56.47	90.00	71.76
Large SUV	73.59	75.20	125.00	95.20

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
1	1.2420	0.9990	1.3464	1.1040	0.9944	1.1009
2	1.6533	0.9990	1.8422	1.1040	1.0396	1.1663
3	1.4720	1.6112	2.0374	1.2696	1.1264	1.4933
4	1.6960	1.6536	2.0374	1.4214	1.1264	1.4933
5	1.5364	1.6112	1.4949	1.2696	1.1264	1.2862
6	1.5364	1.4000	1.6592	1.2696	1.0032	1.2154
7	1.6960	1.5912	1.6533	1.4214	1.1264	1.7066
8	1.6533	1.0878	1.4949	1.2696	1.0736	1.1663
9	1.5364	1.6112	1.4949	1.1040	1.0208	1.4522
10	1.6960	1.6112	1.8422	1.1040	1.0488	1.7066
11	1.6533	1.4840	1.8422	1.2696	1.0032	1.4522
12	1.7702	1.4840	1.3464	1.2696	1.0208	1.1663
13	1.6960	1.6872	1.4949	1.2696	1.0672	1.4522
14	1.6533	1.1766	1.4949	1.2696	1.0032	1.2154
15	1.7702	1.6112	1.4949	1.4214	1.1264	1.2862
16	1.1745	1.0388	1.0791	0.9120	1.0032	0.9991
17	1.1745	0.9540	1.3464	1.1040	1.0736	1.0403
18	1.7004	1.5504	1.3298	1.2535	1.0208	1.4522
19	1.7940	1.5352	1.3464	1.1881	0.9944	1.2154
20	1.6533	1.5352	1.3464	1.4214	1.0208	1.2154
21	1.8400	1.5504	2.1710	1.4214	1.0488	1.4933
22	1.7702	1.6112	2.1710	1.4214	1.0032	1.2862
23	1.3572	1.1130	1.6592	1.1040	1.0032	1.0403
24	1.1745	1.1130	1.0900	0.9120	1.0032	1.0403
25	1.4352	1.0878	1.7680	1.2696	1.0736	1.1009
26	1.4352	1.4288	1.0791	1.0028	0.9944	1.2036
27	1.7702	1.4508	1.7680	1.2426	1.0208	1.4111
28	1.5840	1.2321	1.4949	1.2696	1.0736	1.2862
29	1.6533	1.6112	1.8422	1.5042	1.0032	1.2862
30	1.4352	1.1100	1.0791	1.1040	1.1264	1.0914
31	1.1745	0.9540	1.3464	1.1040	1.0032	1.0573
32	1.4352	1.1766	1.3464	1.1040	1.1264	1.2154
33	1.0527	1.1211	1.0791	1.0028	0.9944	0.9894
34	1.7702	1.5600	1.4949	1.5870	1.1776	1.4651
35	1.7940	1.5504	1.3464	1.3110	1.0208	1.2862

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
36	1.4715	1.5200	1.0791	1.1615	1.0208	1.3700
37	1.4352	1.1766	1.0791	1.0488	1.1264	1.1663
38	1.3572	1.0500	1.3464	1.2696	1.0736	1.1021
39	1.4529	1.1550	1.6592	1.1040	1.1224	1.1663
40	1.4352	1.0388	1.3464	1.4214	1.1224	1.1009
41	1.2420	1.4840	1.0791	1.1881	1.0208	1.1009
42	1.3365	1.1211	1.0791	1.1227	0.9944	1.0302
43	1.8408	1.6568	1.0791	1.2535	1.0208	1.5458
44	1.7940	1.5352	1.3464	0.9120	1.1776	1.4522
45	1.7004	1.6112	1.3298	1.3110	1.1264	1.2508
46	1.6533	1.5200	1.3464	1.0488	1.1776	1.4933
47	1.1132	1.1100	0.9009	1.0028	0.9944	1.0706
48	1.1745	0.8880	1.0791	1.1040	0.9944	1.0355
49	2.2776	1.6872	1.3298	1.3110	1.0032	1.7947
50	1.9706	1.7316	1.3464	1.3110	1.1264	1.5481
51	1.2420	0.9540	1.3464	1.1040	1.0736	1.1009
52	1.1745	1.4280	1.0791	1.1227	0.9944	1.0914
53	1.1745	1.4280	1.0791	1.2696	0.9944	1.0700
54	1.2420	1.1766	1.0791	1.1040	1.0032	1.1009
55	1.2420	1.1130	1.3464	1.1040	1.0032	1.0403
56	1.1745	1.1130	1.0791	1.2696	1.1264	0.9991
57	1.1554	1.1211	0.9009	1.1881	0.9504	0.9500
58	1.1745	0.9800	1.3464	1.2696	1.0032	1.0403
59	1.0527	0.9800	1.0791	0.9120	1.0032	0.9894
60	0.9222	1.1100	0.9100	1.0403	0.8712	1.0302
61	1.0527	1.1100	1.0791	0.8720	1.1264	0.9894
62	1.1745	0.9900	1.7680	1.1040	1.0396	1.1009
63	1.4278	1.1100	0.9009	1.1615	1.1776	1.3231
64	1.0176	1.0500	0.9009	1.1009	1.0509	0.9737
65	1.3915	1.4140	0.9009	1.1615	1.0208	1.1342
66	1.1040	1.1211	0.9100	0.9156	0.9504	1.0706
67	1.1236	1.1322	0.9009	1.1615	0.9944	1.1663
68	1.0494	1.0434	0.9009	1.0403	0.9504	1.1800
69	1.4310	1.4840	1.0791	1.1881	1.0208	1.1663
70	1.3365	1.4280	1.0791	1.1881	1.0672	1.2862

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
71	0.9222	1.0605	1.0900	1.0403	0.9936	0.9991
72	1.3365	1.0878	1.0791	0.9120	1.1264	0.9991
73	1.3915	1.4280	1.0791	1.1227	1.0396	1.1663
74	1.3365	1.4280	1.0791	1.1881	0.9504	1.0914
75	1.1979	1.1322	1.3298	1.0488	1.0208	0.9700
76	1.0527	1.0710	1.3464	0.9120	0.9944	0.9991
77	0.9752	1.0434	1.0791	1.1227	0.9504	0.9700
78	1.0527	0.9800	1.0791	0.9120	1.0208	0.9991
79	1.0527	1.1130	1.0791	0.9120	1.0208	0.9991
80	0.9752	0.9898	0.9009	1.1227	0.9944	0.9785
81	1.1745	1.1100	1.3464	0.9120	1.0208	1.1009
82	1.2420	1.1322	1.3464	1.0488	0.9504	1.0573
83	1.1745	1.1322	1.3464	1.0488	0.9504	0.9894
84	1.1132	1.0710	1.0900	0.8720	0.9944	0.9991
85	1.1132	1.0710	1.0791	0.9120	1.0208	0.9991
86	1.0527	1.4140	0.9100	0.8720	0.9504	1.0302
87	1.1745	0.9800	1.0900	0.9120	1.1264	0.9894
88	1.2420	1.1322	1.3464	1.0488	0.9944	1.0302
89	1.0464	0.6400	0.9009	1.1227	0.9504	0.8976
90	1.0527	1.0500	1.3464	0.9120	0.9944	1.0100
91	1.0527	0.9996	0.9009	0.9120	0.9944	0.9785
92	0.9222	1.0710	0.9100	0.8720	0.9504	0.9282
93	0.9222	1.0605	0.9100	0.9292	0.9504	0.9100
94	1.3365	1.1211	1.0900	0.9120	1.0672	1.0914
95	0.9752	1.1766	0.9100	1.0028	0.9936	1.0302
96	0.9752	1.0323	0.9009	1.1009	0.8712	0.9506
97	1.0494	0.9870	0.9009	1.1009	0.9108	1.0573
98	1.1979	0.9540	1.0791	0.9120	1.1264	0.9894
99	0.9752	0.9996	1.0900	1.0028	0.9504	0.9690
100	1.5444	1.4000	1.0791	0.9120	1.0396	1.1021
101	0.8832	0.9765	0.9009	1.0403	0.9108	1.0700
102	1.0527	1.1130	1.3464	0.9120	1.0672	1.0700
103	0.9222	1.0710	0.9009	1.0028	0.9504	0.9894
104	1.0494	1.0710	0.9100	0.9292	0.9504	0.9500
105	1.1132	1.1322	1.0900	1.0028	0.9504	0.9894

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
106	1.0494	0.9870	0.9100	0.8080	0.8712	0.9690
107	1.4352	1.1211	1.0900	0.9120	1.0208	1.0403
108	1.2420	1.1211	1.0791	1.0028	0.9944	1.1009
109	0.9752	0.9765	1.0791	0.9120	1.0208	1.0735
110	1.3915	1.1766	1.0791	1.0028	1.0208	1.1413
111	1.7004	1.4280	1.8422	1.5042	1.0208	1.1021
112	1.3365	1.4140	1.0791	1.0488	0.9504	1.1009
113	1.8408	1.1766	1.9630	1.4214	1.0032	1.0706
114	1.6536	1.4840	1.8422	1.5042	1.0736	1.1342
115	1.2420	1.4000	1.0791	1.1742	0.9936	1.1663
116	1.2508	1.1100	0.9009	1.0028	1.0396	1.1009
117	1.5525	1.1766	1.0791	1.1742	1.0672	1.1009
118	1.2508	1.1100	1.6592	1.0488	1.0672	1.1009
119	1.8400	1.5400	2.1710	1.5042	0.9944	1.3334
120	1.6536	1.4840	1.8422	1.5042	1.0032	1.1663
121	1.7440	1.6872	2.0374	1.5042	1.1224	1.4522
122	1.6533	1.4840	2.1710	1.2696	1.0736	1.2508
123	1.5444	1.4840	1.3464	1.4214	0.9944	1.1663
124	1.2190	0.9870	0.9009	1.1615	0.9504	1.0355
125	1.4715	1.5400	1.0791	1.2535	1.0208	1.2091
126	1.6536	1.5540	1.3464	1.2696	1.1264	1.1663
127	1.7702	1.4840	1.3464	1.5870	1.0208	1.1663
128	1.7940	1.4840	1.3464	1.2426	1.0208	1.1009
129	1.9205	1.6872	1.6592	1.5870	1.1264	1.2508
130	1.0464	0.9898	0.9009	1.1615	0.8712	0.9991
131	1.1979	1.1766	1.0791	1.1742	0.9944	1.0355
132	1.4529	1.6872	1.3464	1.5042	1.1264	1.2154
133	1.5444	1.0780	1.3464	1.4214	1.0736	1.1009
134	1.7702	1.5540	1.8422	1.5042	1.1264	1.1663
135	1.4715	1.0878	1.0791	1.4214	1.0032	1.0573
136	1.6536	1.1130	1.3464	1.4214	1.0032	1.1009
137	1.5525	1.1655	1.3464	1.2696	1.0208	1.1663
138	1.1979	1.1766	1.0791	1.1881	0.9108	1.0355
139	1.7702	1.2210	1.9630	1.4214	1.0736	1.1663
140	0.9752	0.9996	1.0791	1.1227	0.8712	1.0355

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 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
141	1.1236	1.0605	0.9009	1.1009	0.8712	0.9785
142	1.2190	1.0388	1.0791	1.1009	0.9108	1.0355
143	1.8408	1.4140	1.3464	1.3110	1.1264	1.1342
144	1.3915	1.2321	1.0791	1.1615	0.9936	1.0573
145	1.3915	1.1766	1.3464	1.2426	0.9936	1.0282
146	1.0176	1.0388	0.9009	1.1009	0.9936	0.9919
147	1.5525	1.2321	1.3464	1.1742	1.0672	1.1009
148	1.9205	1.6872	2.1710	1.5042	1.0736	1.2508
149	1.4352	1.5352	1.3464	1.2426	1.1776	1.2508
150	1.8400	1.5400	2.1710	1.2696	0.9944	1.4522
151	1.4310	1.4000	1.0791	1.2426	1.1264	1.0302
152	0.9752	0.9800	0.9009	1.0028	0.9936	1.0355
153	1.1236	0.9996	0.9100	1.0028	1.0044	1.1009
154	0.8832	0.9000	0.9100	0.9292	0.9108	0.9919
155	1.1979	0.9800	0.9009	0.8720	1.0208	0.9785
156	1.1132	1.0710	1.0791	0.8720	0.9936	0.9991
157	1.1745	1.0388	1.3464	0.9120	1.0032	1.0573
158	0.9222	0.9800	0.9100	1.1227	0.9936	1.0355
159	0.9222	1.0710	0.9100	0.9292	0.9504	1.0355
160	0.9752	0.9996	0.9100	1.0403	0.9504	0.9785
161	0.9222	0.9000	1.0791	0.9120	1.0672	0.9785
162	1.3572	1.1322	1.4949	1.1040	1.0208	1.0403
163	0.9752	0.9180	0.9100	1.0028	1.0396	1.0355
164	1.0527	1.0388	1.3464	0.9120	1.0208	0.9894
165	1.0527	0.9540	1.3600	1.1040	1.1776	0.9991
166	1.1979	1.0710	1.3464	1.0488	0.9504	1.0573
167	1.0527	0.9540	1.0791	0.9120	1.1776	1.0573
168	1.0527	1.0388	1.0791	1.1742	1.0672	0.9991
169	0.9752	0.9996	0.9100	1.1009	0.9108	1.0355
170	1.3572	1.4140	1.4949	1.1040	0.9944	1.0700
171	1.4352	1.4280	1.4949	1.1040	0.9944	1.0100
172	0.8514	0.8160	0.9100	1.1615	0.9200	1.0028
173	0.8832	0.9114	0.9100	0.9292	1.0800	0.9894
174	0.8502	0.6464	0.9009	0.7728	1.0800	0.9752
175	1.0148	0.7171	0.9100	1.1009	1.0800	1.0283

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 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
176	0.8352	0.9765	0.9009	1.0028	1.2876	0.9737
177	0.8352	1.0323	1.0791	1.0028	1.2800	1.0738
178	0.8832	0.9870	0.9100	1.0028	1.1780	0.9737
179	0.8832	0.8460	1.0791	1.1009	1.0296	0.9690
180	0.9504	0.9212	0.9009	1.0403	1.2276	0.9737
181	0.9116	0.7526	0.9100	0.9660	0.9900	0.9592
182	0.7482	0.8080	0.9009	1.1227	1.1856	1.0283
183	0.9222	0.9870	0.9009	0.8720	1.2064	0.9700
184	0.9116	0.6464	0.9009	1.1009	1.0788	0.9752
185	1.0148	0.9000	0.9100	1.1009	1.1300	0.9646
186	0.7482	0.9114	0.9100	1.1009	0.8556	0.9506
187	0.7912	1.0323	0.9009	0.8652	0.8556	0.9898
188	0.9222	0.9765	1.0900	1.0028	1.0800	0.9700
189	0.9222	0.9870	1.0791	0.9120	1.2800	1.0100
190	0.9545	0.7171	0.9100	0.9156	0.9900	0.9476
191	1.0148	0.6674	0.9009	1.0403	1.1600	1.0396
192	0.9222	0.9870	0.9100	0.8720	1.0800	1.1800
193	1.1236	1.1211	0.9100	0.9292	1.0296	0.9894
194	0.8514	0.6016	0.9009	0.9292	1.2800	1.0396
195	1.0176	0.9540	0.9009	1.1615	0.8556	0.9919
196	0.8798	0.6528	0.9009	1.0403	1.0509	0.9592
197	0.9374	1.0710	0.9100	0.9660	0.9500	0.9282
198	0.8514	1.0434	0.9009	1.1615	0.8835	0.9700
199	1.0464	1.0434	0.9009	0.9660	1.0070	0.9191
200	0.8514	0.9898	0.9100	0.8652	0.8835	0.9100
201	0.9116	0.9898	0.9100	0.9660	0.9500	0.9991
202	0.9374	1.0710	0.9009	0.9660	0.8556	1.0573
203	0.9752	0.9765	0.9100	1.1009	1.0800	1.0100
204	0.9222	0.9114	0.9100	1.0403	0.9207	1.0700
205	0.9890	0.9212	0.9100	0.9660	0.9568	0.8827
206	0.9504	1.0605	1.0900	1.1881	0.8556	1.0914
207	1.0176	0.9870	0.9009	1.1009	1.0494	0.9737
208	0.8352	0.9212	0.9100	1.1615	0.9207	1.0355
209	0.8798	0.7242	0.9100	0.9660	1.0800	1.0396
210	0.9890	1.0434	0.9009	0.9660	0.9200	0.9737

State: **CALIFORNIA**
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USAA CASUALTY INSURANCE COMPANY
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PURE PREMIUM BAND

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211	0.9752	1.5200	0.9009	1.1615	0.9660	1.4522
212	1.7702	1.7004	0.9009	1.1009	1.1448	2.1091
213	0.9504	1.0434	0.9009	1.0403	0.9752	0.9737
214	0.9752	1.0605	1.0791	1.2535	1.0070	0.9737
215	0.8832	1.1211	1.0791	1.1881	0.9975	1.0486
216	1.1236	1.1130	0.9009	1.1227	0.9207	1.2445
217	0.9890	0.8480	0.9009	1.1009	1.0800	1.0355
218	0.8514	1.0605	0.9009	0.9156	1.0296	0.8645
219	0.9374	0.9996	0.9100	0.9660	1.0800	1.0573
220	0.9116	0.7526	0.9100	1.1009	0.9900	0.9328
221	1.2118	0.9540	0.9100	0.9660	1.0044	1.1921
222	0.8352	0.9800	1.0791	1.0403	0.8556	1.0302
223	1.0176	0.8800	0.9009	1.1615	1.0800	0.9646
224	0.8832	1.0434	0.9100	1.0403	0.9752	0.9191
225	0.9116	0.9765	0.9009	0.9660	0.8556	0.9282
226	0.7912	0.9765	0.9100	1.1009	0.9975	0.9191
227	0.8832	0.9765	0.9009	1.0403	0.8464	0.9991
228	0.9222	1.0710	1.0791	1.1227	0.8464	0.9894
229	0.9890	1.1655	0.9009	0.9660	1.0044	1.1921
230	0.8832	0.9870	0.9100	1.1009	1.0212	1.0738
231	0.9504	0.9765	0.9009	1.1009	0.9752	0.9737
232	0.9752	1.3160	1.0791	0.9292	0.9207	1.0738
233	1.1745	1.3020	1.8422	1.4214	1.1300	1.0486
234	0.9116	1.0323	0.9009	0.9156	0.9660	0.9737
235	0.9504	1.0434	0.9100	0.8652	0.9207	0.9191
236	1.0494	0.9870	0.9009	1.1009	1.1448	1.0738
237	0.8832	1.1211	0.9009	0.9156	1.0494	1.0738
238	0.7912	0.9765	0.9009	0.7728	0.8556	0.9898
239	0.8832	1.0434	0.9009	1.0403	1.0494	0.9737
240	1.0527	0.9765	1.0791	1.0028	1.0044	0.9700
241	1.0527	1.3160	1.0791	1.1881	0.9900	1.0738
242	0.8832	1.0323	0.9100	1.0403	0.9900	0.9737
243	0.7912	1.0323	0.9009	0.9660	1.0494	0.9191
244	0.9545	1.0434	0.9009	0.6720	1.1780	0.9191
245	0.8514	0.9212	0.9009	0.9156	0.9660	0.9898

State: **CALIFORNIA**
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
246	0.9890	0.9870	0.9009	0.7728	0.9207	0.9506
247	0.9504	0.9212	0.9009	1.1009	1.0494	0.9191
248	0.9504	1.0434	0.9009	1.1615	1.1408	0.9737
249	0.7912	1.0434	0.9009	0.9156	1.1780	0.9737
250	0.9504	1.1211	1.0791	1.1009	0.9752	0.9737
251	0.9890	0.9765	0.9009	0.9660	0.9752	0.9191
252	0.8514	0.9765	0.9100	0.8652	0.9660	0.9191
253	0.9504	0.9765	0.9009	0.9156	1.0545	0.8827
254	0.8514	1.1211	0.9009	0.8652	1.0070	0.9898
255	0.8514	1.0605	0.9009	0.9156	0.9975	0.8827
256	1.1236	1.4140	0.9009	1.1227	1.0494	1.2036
257	1.3572	1.7316	0.9009	0.6720	1.0070	1.2862
258	1.4352	1.5912	1.0791	0.8720	1.1780	1.7066
259	1.2190	1.6872	0.9009	0.7728	1.0296	1.2154
260	1.4310	1.6536	0.9100	0.8652	1.1448	1.8193
261	0.8352	1.0323	0.9009	0.8720	1.3312	0.9737
262	1.0176	1.5352	0.9009	0.8080	1.0545	1.2862
263	0.7482	0.6674	1.0791	0.8720	1.1752	0.9690
264	0.7912	0.8480	0.9009	1.0028	1.3568	1.0355
265	0.9116	0.8160	0.9100	1.1009	1.1978	0.9373
266	0.9047	0.7520	0.9009	0.9660	1.0800	0.9919
267	0.9047	0.8370	0.9009	0.9660	1.0296	0.9500
268	0.7912	0.7520	0.9100	1.0403	0.9108	0.9690
269	0.8832	0.8000	0.9100	1.0028	1.0044	0.9919
270	0.8970	0.6528	0.9009	0.9292	1.0044	0.8976
271	0.8217	0.6400	0.9009	1.0403	1.1904	0.9476
272	0.9374	0.7242	0.9009	0.9292	1.0800	0.9476
273	0.7722	0.6784	0.9009	0.8080	1.0509	0.9752
274	0.9116	0.8160	0.9009	0.9292	1.3568	0.9919
275	0.7912	0.8480	0.9009	1.1227	1.1752	1.0355
276	0.8514	0.7526	1.0791	1.0028	1.3542	1.0355
277	0.9890	0.7242	0.9100	1.1227	1.1978	0.9476
278	1.0176	0.9540	1.0791	1.1881	1.3440	1.0355
279	0.8798	0.7526	0.9009	1.1009	1.0044	1.0028
280	0.8217	0.7100	0.9009	0.8080	1.0602	0.9919

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
281	0.6786	0.6400	0.9009	0.8080	1.0602	0.9328
282	0.9794	0.6784	0.9009	0.9292	1.1904	1.0028
283	0.9890	0.7526	0.9100	1.0028	1.1448	0.9476
284	0.9890	0.7440	0.9009	1.0403	1.1752	0.9919
285	0.7912	0.7104	0.9009	1.2535	1.2654	1.0355
286	0.9504	0.6528	1.0791	0.9292	1.3312	0.9752
287	0.7221	0.6784	0.9009	1.0403	1.2800	1.0028
288	0.9374	0.9090	0.9009	0.9660	1.0800	0.9785
289	1.0464	0.9540	1.3298	1.2535	1.1600	1.0282
290	0.9794	0.9180	0.9009	0.9156	1.0800	0.9690
291	0.8970	0.6016	0.9009	0.9292	1.0044	0.9592
292	0.9374	0.7242	0.9009	1.1615	1.0800	0.9752
293	0.8514	0.6784	0.9009	0.9292	1.2084	0.9646
294	0.9374	0.8480	0.9009	1.1615	1.1978	0.9282
295	1.1328	0.9898	0.9100	1.0403	1.0212	1.0700
296	1.3189	1.6568	0.9009	0.8080	1.1340	2.1091
297	0.7912	0.6528	0.9100	1.0028	1.0788	0.9476
298	0.7636	0.6784	0.9009	0.8080	1.1904	0.9592
299	0.9752	1.1655	0.9009	0.8080	1.0602	1.1009
300	0.8217	0.7526	0.9009	0.9156	1.0494	0.9476
301	1.0527	0.9540	1.0900	1.2696	1.0672	1.0573
302	1.1554	1.1766	0.9100	1.1009	1.0494	1.2508
303	1.1040	0.9810	0.9100	1.0028	1.0044	1.0070
304	1.1040	0.8480	0.9009	1.1227	0.9936	1.0028
305	1.2190	0.9000	0.9100	1.0028	0.9936	0.9373
306	0.9047	0.8460	0.9100	0.9292	1.1780	0.9191
307	1.0176	0.7242	1.0791	1.0028	1.0494	0.9785
308	0.8832	0.9996	0.9100	0.8720	0.9936	0.9373
309	0.7636	0.9000	0.9100	0.7728	0.9207	0.9373
310	0.8798	0.9180	0.9100	1.0403	0.9108	0.9919
311	1.1132	0.8880	1.0900	1.1040	1.1776	1.0355
312	0.9222	0.9898	0.9009	1.1742	1.0788	1.0355
313	0.9752	0.9898	0.9100	1.0028	0.9108	0.9894
314	0.7482	0.9090	0.9100	1.0403	0.9108	0.9282
315	1.0527	0.9000	1.0900	0.9120	1.0672	1.0573

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
316	0.8832	0.9800	0.9009	0.9120	1.0044	0.9991
317	0.9047	0.6464	0.9009	0.9292	1.0800	0.9064
318	1.1328	0.9180	0.9009	1.0403	0.9752	1.0302
319	0.9752	0.9540	1.0791	0.9120	1.0672	1.0355
320	1.0148	0.9900	0.9009	1.0028	1.0494	1.1413
321	0.8832	0.9212	0.9100	0.9292	1.0044	1.0573
322	0.8514	0.9990	0.9100	1.1227	1.0044	0.9646
323	1.1040	0.8160	0.9009	1.2426	0.9660	0.9282
324	1.1236	0.9990	1.0900	1.3110	1.1300	0.9646
325	0.9752	0.9540	1.0900	1.0488	1.0509	1.0355
326	0.9374	0.7526	0.9009	0.9292	1.0296	1.0028
327	0.9116	0.9000	0.9009	1.1227	1.0509	1.0070
328	1.1040	0.9898	0.9100	1.0028	0.9108	0.9785
329	1.1328	0.7739	1.0791	1.0028	1.1300	1.0028
330	0.9374	0.6528	0.9009	1.0403	0.9200	0.9064
331	1.3695	0.6674	0.9009	0.6720	1.0800	1.0028
332	1.0148	0.6528	1.0791	0.8080	1.0395	0.9592
333	1.2190	0.8160	1.0791	1.1227	0.9900	1.0028
334	1.1040	0.7881	1.0791	1.1227	1.0044	0.9373
335	0.9504	1.0388	0.9100	1.1881	1.0044	1.0355
336	0.9794	0.7104	0.9009	1.0403	1.0044	0.8976
337	0.9374	0.9180	0.9100	1.0028	0.9207	0.9646
338	1.1388	0.6528	0.9009	0.9292	1.0044	0.8800
339	1.0527	1.0388	1.0791	1.1227	0.9936	1.0355
340	1.3365	0.9540	1.3464	1.5870	1.1600	1.0573
341	1.1132	0.9000	1.0900	0.9120	1.0396	0.9991
342	1.1040	0.8000	0.9009	1.1881	0.9900	0.9752
343	1.1132	0.9540	1.0900	1.0488	1.0672	1.0355
344	1.1979	0.9540	1.0900	1.0488	1.0208	1.0573
345	1.0527	1.0710	1.0791	1.0488	0.9944	0.9991
346	0.9752	1.0388	1.0900	0.9120	0.9944	1.0355
347	1.0527	0.9800	1.0791	0.9120	0.9944	0.9991
348	0.8832	0.7440	0.9100	1.0028	0.9108	0.9690
349	0.8352	0.8480	0.9009	1.0403	0.9900	0.9752
350	0.9116	0.7526	0.9009	1.1009	1.0044	1.0283

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
351	1.0494	0.9996	1.0791	1.0488	1.0044	0.9690
352	0.9752	0.8480	1.0900	0.8720	1.0672	0.9373
353	0.9374	0.7171	0.9009	0.8720	1.0800	0.9919
354	0.9752	1.1100	0.9100	1.1009	1.0395	1.0100
355	0.9752	1.0605	1.0791	1.0403	1.0212	1.0486
356	0.9504	0.8480	1.0900	1.1742	1.0396	0.9919
357	1.1554	0.9000	1.0900	1.1742	1.0396	0.9919
358	1.2826	1.0388	1.0900	1.1227	0.9900	1.1663
359	1.0464	0.9212	1.0900	1.1881	0.8464	0.9282
360	0.9752	0.9800	0.9100	1.0403	0.9207	0.9919
361	0.9222	0.9765	0.9009	1.1881	0.9200	1.0302
362	1.1236	0.9870	0.9100	1.0403	1.0545	0.9191
363	1.0176	0.9000	1.0900	1.0403	0.8556	0.9373
364	1.2190	0.9898	1.0900	1.1881	0.9200	0.9785
365	0.9222	1.0434	1.3464	1.0403	0.9108	0.9991
366	0.8832	1.0605	0.9009	0.9156	0.8464	1.0070
367	0.9222	1.0605	1.0791	1.0028	0.8096	0.9690
368	1.0176	1.0710	0.9009	0.9156	0.8740	0.9919
369	1.1979	1.4140	1.0791	1.1881	0.9108	1.1009
370	0.9752	1.0605	1.0791	0.9292	0.8096	0.9991
371	0.9752	1.0323	1.0791	1.1009	0.8464	0.9894
372	0.8798	0.9898	0.9009	0.9156	0.8464	0.9282
373	0.8832	0.9870	0.9009	0.9156	0.9936	1.0070
374	0.9752	1.1211	1.0791	1.1009	0.9504	0.9690
375	1.4190	1.3020	0.9009	0.9660	0.9504	0.8827
376	1.0494	0.9800	1.0791	1.1615	0.8712	0.9894
377	1.2826	1.0605	1.0791	1.1227	0.9504	0.9690
378	1.0176	1.0710	0.9100	1.1009	0.9108	0.9991
379	1.1236	1.0710	0.9009	1.1009	0.9504	0.9785
380	0.8832	0.9765	0.9009	1.1615	0.8464	0.9373
381	0.9504	0.9765	0.9100	0.9156	0.8464	0.9991
382	1.1040	1.1130	0.9009	0.9156	0.9936	1.2707
383	0.9504	1.0605	0.9009	1.1615	0.9936	1.0706
384	0.9752	1.1211	0.9009	1.1009	0.9936	1.0070
385	0.8352	0.9765	0.9009	0.9660	0.9504	0.9785

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
386	0.8514	0.9996	0.9009	0.9156	0.9200	0.8827
387	0.8514	0.9870	0.9009	0.9156	0.9108	0.9919
388	0.9222	1.0388	0.9009	1.1227	1.0509	0.9752
389	1.0176	1.0434	0.9009	1.1615	0.9200	0.8827
390	1.3572	1.0710	1.4949	1.2696	0.9944	0.9700
391	0.7912	0.9898	0.9009	0.9156	0.8464	0.9700
392	1.1236	0.9870	0.9009	1.1227	0.9504	1.0573
393	0.9222	1.0605	1.0791	1.0403	0.9108	1.0355
394	1.3572	1.1322	1.3464	1.2696	1.0208	1.0302
395	0.9222	0.9800	0.9009	1.0028	0.8712	0.9282
396	0.8832	0.9000	0.9100	1.0403	0.8712	1.0028
397	0.9222	1.0710	1.0900	0.8720	0.8556	0.9785
398	0.9752	0.9996	1.0791	1.1227	0.9752	1.0355
399	0.9222	1.0710	0.9009	1.1009	0.9108	1.0355
400	0.9504	0.9898	0.9100	1.0403	0.8464	0.9100
401	1.1040	0.9114	0.9009	1.0403	0.8712	1.0100
402	0.9890	0.9898	0.9009	0.8652	0.8464	0.9500
403	0.9504	0.9996	0.9100	1.1615	0.8096	1.0573
404	0.9545	0.9180	0.9100	0.8652	0.8464	0.9384
405	1.1554	1.0388	0.9009	1.1615	0.9108	0.9919
406	0.8798	0.8160	0.9009	0.8652	0.8464	0.9476
407	0.9752	0.9540	1.3298	0.9120	1.0672	0.9894
408	0.9504	0.9540	1.0791	1.1227	0.9108	0.9500
409	1.0464	0.8480	1.0900	1.0403	1.0396	0.9919
410	1.0494	0.9800	1.0791	1.1742	0.8556	1.0914
411	1.2508	1.0710	1.0791	1.0028	0.9207	1.1663
412	0.7482	0.7100	0.9100	0.9292	0.9936	0.9064
413	1.0464	0.9540	0.9009	1.0403	0.9108	0.9752
414	0.7912	1.0605	0.9009	0.9156	0.8556	0.9700
415	0.9504	1.0500	0.9009	0.8652	1.0044	0.9700
416	0.9374	0.9870	0.9009	0.9660	0.9108	0.9500
417	0.9752	1.2321	1.0791	1.0403	1.0044	1.1009
418	0.9374	1.0388	1.1102	0.9660	0.9936	1.0355
419	0.7636	0.9090	0.9009	0.8652	0.8464	0.9100
420	0.9116	0.7100	1.0791	1.0028	1.0044	0.9282

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
421	1.1040	0.7810	1.7680	1.2535	1.1346	1.0355
422	0.8798	0.6784	0.9009	0.8080	1.0509	0.9476
423	0.7912	0.7171	1.0791	1.1227	1.0396	0.9919
424	0.9116	0.7104	0.9100	0.9292	1.0788	0.9646
425	0.7482	0.7040	1.0900	0.8720	1.2800	0.9919
426	0.8502	0.6528	0.9100	0.9156	1.0296	0.9476
427	0.7482	0.6784	1.0900	1.0028	1.0044	0.9592
428	0.7912	0.7881	1.0791	0.8720	1.2200	0.9785
429	0.7636	0.7104	1.0791	0.8720	1.1752	0.9646
430	0.9222	0.8880	1.3600	0.8720	1.0509	0.9373
431	0.8798	0.7242	0.9009	0.9156	1.0296	1.0028
432	1.1328	0.7526	0.9009	1.1881	1.0044	0.9919
433	1.1328	0.9810	1.1102	1.0028	1.0396	0.9919
434	0.8514	0.6784	1.0791	0.8720	1.0509	0.9476
435	0.8798	0.6016	0.9009	1.1615	1.0509	0.9328
436	1.3695	0.6400	0.9009	1.1009	1.0396	0.9592
437	0.9752	0.7881	1.3600	1.0488	1.1346	0.9991
438	0.9116	0.7526	0.9009	0.9292	1.0044	0.9384
439	1.1236	0.8480	1.0791	1.1881	1.0396	0.9752
440	0.8217	0.7171	0.9009	0.8720	1.0044	0.9064
441	0.9374	0.7520	0.9009	1.0403	1.0494	0.9310
442	0.7636	0.7040	1.0791	0.9156	1.1346	1.0028
443	0.9890	0.7040	1.0791	0.8720	1.2800	0.9919
444	0.8970	0.6528	0.9100	1.1009	1.0800	0.9592
445	1.0176	0.7526	0.9100	1.0403	1.0044	1.0028
446	0.6786	0.6464	0.9100	0.9156	0.9900	1.0028
447	1.3695	0.6400	0.9009	1.0403	1.0044	0.9064
448	0.8832	0.7242	1.0791	1.0028	1.1300	0.9282
449	0.8352	0.7104	1.0791	1.0028	1.0788	0.9919
450	0.7221	0.7040	0.9100	0.7728	1.0044	1.0028
451	1.1328	0.8880	1.4170	1.1227	1.0602	0.9919
452	0.7482	0.6784	0.9009	1.0403	0.9900	0.9592
453	0.9116	0.7040	1.3298	0.8720	0.9207	0.9373
454	0.9504	0.7739	1.0791	1.0028	1.0788	0.9785
455	0.8217	0.7104	0.9009	0.8080	0.9900	0.9592

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
456	0.8832	0.6976	1.0900	0.9292	1.1600	0.9384
457	0.8352	0.7526	1.0791	1.0028	1.1600	0.9373
458	0.8832	0.9000	1.0900	1.0403	0.8556	0.9100
459	0.9374	0.6528	0.9009	1.0403	1.0396	0.9592
460	1.4016	0.8480	1.3298	0.9292	1.1904	0.9476
461	0.9752	0.8000	1.0791	0.8720	1.0044	0.9919
462	1.0494	1.0500	1.0791	0.8720	1.0788	0.9894
463	0.9504	0.9000	1.1102	1.0028	1.0509	0.9373
464	1.1554	0.9000	1.0900	1.2535	1.0396	1.0573
465	0.9504	1.0388	1.1102	1.0403	1.0788	0.9373
466	0.9504	0.9990	1.1830	1.1881	1.0396	0.9919
467	0.7636	0.8000	0.9009	0.9660	0.8556	0.9200
468	0.7912	0.9800	0.9009	0.9660	0.8556	0.9282
469	0.9545	0.8000	0.9100	0.7728	0.8556	0.9476
470	0.7722	0.7526	0.9100	0.9660	0.9200	0.9476
471	0.8798	0.7104	0.9009	0.9156	1.0800	0.9328
472	0.7636	0.7100	0.9100	0.8652	0.9500	0.9064
473	0.8970	0.6674	0.9009	0.9660	0.9900	0.8800
474	0.7912	0.7810	0.9100	0.8080	0.8556	0.9373
475	0.8502	0.8480	0.9009	0.9660	0.8556	0.9064
476	0.7176	0.6784	1.1102	0.9660	1.0800	0.9328
477	1.3695	0.8480	0.9100	0.9156	0.8556	0.9384
478	0.7482	0.7526	1.0900	0.8720	0.9207	1.0355
479	0.8502	0.7526	0.9009	0.9660	0.9207	0.9592
480	0.7636	0.7520	0.9100	0.8652	0.9900	0.9500
481	0.9545	0.7100	0.9100	0.7728	0.9975	0.9282
482	0.8217	0.6674	0.9100	0.9292	0.9207	1.0028
483	0.9545	0.8160	0.9009	0.9660	0.9207	0.8976
484	0.7221	0.7100	0.9100	0.6720	0.9500	0.9476
485	0.7636	0.8480	0.9009	0.9660	0.9900	1.0028
486	0.7636	0.7526	0.9009	0.9660	1.0800	0.8976
487	0.7221	0.7526	0.9009	0.9660	1.1232	0.9752
488	0.7482	0.8480	0.9009	0.8080	0.9207	0.9500
489	0.7482	0.8000	0.9009	1.0403	0.8556	0.9282
490	0.7482	0.7526	1.0791	0.8720	1.0800	0.9500

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
491	0.9545	0.8480	0.9009	0.8652	0.9207	1.0028
492	0.9047	0.7171	0.9009	0.8652	0.8556	0.9064
493	0.8268	0.6784	0.9100	1.0403	1.0296	0.8976
494	0.8970	0.5952	0.9009	1.1009	0.9207	0.8976
495	0.8502	0.6016	0.9100	0.7728	1.0800	0.8976
496	1.3695	0.6528	0.9009	1.3110	0.9900	0.9064
497	1.1388	0.6528	0.9009	0.9660	1.0494	0.9752
498	1.3695	0.6784	0.9009	1.1009	1.0044	0.9064
499	0.9890	0.6464	1.1102	1.2535	0.9752	0.8976
500	1.2870	0.6464	0.9009	1.0403	1.0800	0.9592
501	1.7490	0.7810	1.0791	1.2426	1.0396	0.9752
502	1.4310	1.0388	1.3464	1.5042	1.0396	1.0355
503	0.9204	0.5952	0.9009	0.9660	1.0494	0.9592
504	1.4310	0.8800	1.3464	1.5042	1.0208	0.9646
505	1.2508	0.7171	1.0900	1.1742	1.0396	1.0028
506	0.9047	0.6784	0.9009	1.0403	1.0044	0.9592
507	0.8970	0.8480	0.9009	0.9156	1.0494	0.9373
508	1.6536	1.0878	1.3464	1.5042	1.1776	1.0573
509	1.4278	0.9540	1.0900	1.2426	0.9944	1.0396
510	1.2870	0.6528	0.9009	1.1009	1.0800	0.9384
511	0.8798	0.7100	0.9009	0.9156	0.9568	0.9476
512	0.9116	0.7881	1.0791	1.1615	0.9568	0.9646
513	0.9047	0.6674	0.9100	1.1009	1.0296	0.9328
514	1.4190	0.6784	1.0900	0.9120	1.1600	1.0028
515	1.1040	0.7526	1.3464	0.9120	1.0788	0.9476
516	0.8832	0.7881	1.0791	0.8720	1.1232	0.9919
517	1.1236	0.9540	1.0791	1.0028	0.8556	0.9100
518	1.1979	0.9800	1.3464	0.9120	1.0044	0.9310
519	0.9047	0.7100	1.1102	0.9660	0.9752	1.0028
520	0.8352	0.7526	1.0900	1.0488	1.1904	0.9373
521	1.1040	0.8480	1.0900	1.1009	0.9200	0.9476
522	0.8798	0.6784	1.0791	0.8720	1.0800	0.9476
523	0.8217	0.6400	0.9100	0.6720	0.9752	0.8976
524	1.1554	0.7526	1.3600	1.1040	1.1300	1.0355
525	1.1328	0.9000	1.0791	1.1009	0.9900	1.2052

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
526	0.8217	0.6784	0.9009	0.9292	1.0044	0.9752
527	1.0464	0.8800	1.0791	1.0028	0.9900	1.0028
528	0.8832	0.7526	1.0791	0.8080	1.0296	0.9384
529	0.8832	0.8480	1.0791	0.9120	1.1300	0.9690
530	0.9890	0.7104	1.3464	1.0028	1.2800	0.9373
531	1.0148	0.7104	0.9009	1.1009	1.1448	1.0396
532	1.0176	0.8480	0.9009	0.9292	0.9568	1.0028
533	1.0176	0.6976	1.3464	1.1742	1.2800	0.9919
534	0.9752	0.7739	1.3600	1.1742	1.1904	0.9646
535	0.9116	0.7526	1.0900	1.0403	0.9500	0.9752
536	0.9222	0.7526	1.4949	1.1040	1.1904	0.9785
537	1.1554	0.8880	1.3464	1.0488	1.1600	0.9690
538	0.8268	0.6464	0.9100	0.9156	1.0494	0.9592
539	1.3572	0.9540	1.6533	1.1040	1.2064	1.0700
540	1.1745	0.9180	1.4949	1.1040	1.0788	0.9506
541	0.9222	0.9996	1.3464	1.1742	0.9207	0.9310
542	1.1745	0.9800	1.4949	1.0488	1.0509	0.9700
543	1.1132	0.8000	1.8422	1.1040	1.2800	0.9700
544	0.9222	0.9180	1.3600	0.8720	0.9900	0.9310
545	1.4352	1.1130	1.6533	1.1040	1.1600	1.0403
546	1.1979	0.9800	1.4949	1.2696	1.1300	0.9894
547	1.0527	0.8160	1.4949	1.1040	1.0800	0.9500
548	1.1132	0.9090	1.3464	1.1040	1.0509	0.9506
549	0.7482	0.9540	1.0791	0.8080	1.0296	0.9506
550	0.8352	0.8880	1.3464	0.8720	1.1970	1.1800
551	0.7912	0.9540	1.0791	0.8720	1.1752	0.9898
552	0.8217	0.8480	0.9009	0.8080	0.9207	0.9500
553	0.9545	0.8480	0.9009	1.0403	0.9200	0.9384
554	1.3695	0.9090	1.1102	0.9660	0.9900	0.9506
555	1.3695	0.8480	0.9009	0.9156	0.9900	0.9919
556	0.8217	0.7526	0.9100	0.6720	0.9900	0.9373
557	0.7636	0.6976	1.0791	0.8080	1.1752	0.9785
558	0.8502	0.7040	1.3298	1.0403	1.2064	0.9785
559	0.8970	0.6784	1.1102	1.0403	1.1232	0.9200
560	0.8970	0.6784	1.1102	0.9660	1.1978	0.9384

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
561	0.8798	0.9000	0.9009	0.6720	0.9200	0.9310
562	0.9047	0.9212	0.9009	0.9156	0.9752	0.9191
563	0.9890	0.9212	0.9009	0.7728	1.0070	0.9506
564	0.8798	0.9114	0.9009	0.9156	0.8835	0.8827
565	1.1388	0.8000	0.9009	0.8652	0.8556	0.8918
566	0.8514	0.8370	1.0791	0.8080	0.9200	0.9191
567	0.9545	0.6784	0.9009	0.9292	1.1600	0.9785
568	0.7482	1.1130	0.9009	0.8652	0.9900	0.9898
569	0.7482	0.9800	1.0791	0.8720	1.0800	0.9506
570	0.8798	0.9898	0.9009	0.9156	0.9200	1.0914
571	1.0527	1.1130	1.3464	0.8720	1.1300	1.1564
572	0.8832	1.0388	1.0791	0.8080	1.0509	1.0486
573	0.8798	0.9900	0.9009	0.8652	0.9207	0.9690
574	0.9545	0.9900	0.9009	0.8652	0.9207	1.0355
575	0.8217	0.8480	0.9100	0.9156	1.0800	0.9785
576	0.7221	0.9114	0.9009	0.7728	0.8556	0.9500
577	0.9374	1.0682	0.9009	0.8652	0.9207	1.0070
578	0.9047	0.9990	1.1102	0.9156	0.8556	0.9919
579	0.8217	1.1130	0.9009	0.7728	0.8556	0.9898
580	0.8832	1.0388	0.9009	0.6720	0.9207	0.9310
581	0.7482	1.0710	0.9009	0.6720	0.8835	0.9506
582	0.7912	0.9765	0.9009	0.7728	0.8556	0.9506
583	0.7636	0.9900	0.9009	0.9660	1.1232	0.9785
584	0.8798	1.0388	0.9009	0.8652	0.9900	0.9991
585	0.8352	1.2321	1.0791	0.9292	1.2064	1.0486
586	0.9545	1.0388	1.0791	0.9156	0.9200	0.9898
587	0.8832	1.1130	1.0791	0.8080	1.0044	1.0486
588	0.8798	1.0605	0.9009	0.8652	0.8556	0.9506
589	0.9116	0.8720	0.9009	0.7728	0.9207	0.9919
590	0.8352	1.1766	1.0900	0.8080	0.8556	0.9898
591	0.8352	1.0710	1.0791	0.6720	0.8556	0.9898
592	0.8514	1.0605	0.9009	0.6720	0.8835	0.9506
593	0.8352	1.0500	1.0791	0.6720	0.8556	1.0100
594	0.9752	1.5200	1.0791	0.9292	1.0494	1.3426
595	1.0527	1.4840	1.0791	0.8080	1.1340	1.3426

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
596	0.9222	1.5540	1.0791	0.9292	1.1232	1.2862
597	0.7912	0.9800	1.0791	0.9292	1.0296	1.2862
598	0.8352	1.1766	1.0791	1.1009	1.0494	1.1800
599	0.9222	1.4140	1.0791	0.9292	1.0494	1.3426
600	1.1236	1.4140	1.0791	0.8080	1.1232	1.3426
601	1.0464	1.2099	1.0791	0.9292	1.0800	1.1021
602	1.1132	1.4840	1.8422	0.9120	1.1300	1.3426
603	0.9504	1.1211	0.9009	1.0403	0.9900	1.1564
604	1.1554	1.3160	1.0791	1.1009	1.0800	1.1564
605	1.1236	1.4280	1.3464	0.9292	1.0044	1.1564
606	0.8514	1.1211	0.9009	0.6720	1.0296	1.1800
607	1.0527	1.4840	1.4949	0.9120	1.2064	1.5778
608	0.9504	1.1766	0.9009	0.8080	0.9207	1.0486
609	0.9752	1.4140	1.0791	0.7728	0.9900	1.0738
610	1.0527	1.4280	1.3464	0.8720	1.1978	1.1564
611	1.3915	1.4840	1.3464	0.8720	1.1300	1.3426
612	1.0176	1.4840	1.3298	0.9292	1.1232	1.3426
613	0.8352	0.9765	1.1102	0.8720	1.0296	1.1800
614	0.8352	1.1766	0.9009	0.8080	0.9207	0.9898
615	0.7636	0.9870	0.9100	0.6720	0.8556	1.0100
616	0.8514	1.1211	0.9009	0.6720	0.8556	0.8827
617	0.7636	1.1100	0.9009	0.8652	0.8835	0.9898
618	0.8832	1.1766	0.9009	0.8652	0.9900	1.0486
619	0.7912	1.0388	0.9009	0.8652	0.8556	0.9310
620	0.9116	1.0710	0.9009	0.8652	0.9200	0.9506
621	1.0494	1.0605	1.3464	0.8720	1.0296	0.9737
622	1.0176	0.9800	1.0791	0.8720	0.9568	0.9898
623	0.8832	1.0878	1.0791	1.0028	0.9568	0.9991
624	1.0464	0.9810	1.0791	1.0028	0.9660	1.0028
625	0.9116	0.9212	0.9009	0.7728	1.0070	1.0355
626	0.7636	0.9898	0.9009	0.8652	1.0070	0.9785
627	0.8798	0.8880	0.9100	0.7728	0.9200	1.0355
628	0.9222	1.1130	1.0791	0.8720	1.0296	1.0100
629	0.7482	0.9990	0.9009	0.8652	0.9568	0.9500
630	1.0176	0.8800	1.0791	1.0028	0.9752	0.9785

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
631	0.8832	0.9090	1.0791	0.8720	0.9568	0.9785
632	0.8832	0.9990	1.0900	0.8080	0.9752	0.9919
633	0.9116	0.9540	0.9009	0.6720	0.9200	0.9500
634	0.7482	1.0388	1.0791	0.7728	0.9568	0.9506
635	0.8352	1.0878	1.0791	1.0403	0.9568	0.9700
636	0.8832	1.1130	1.0791	0.8080	0.8556	0.9506
637	0.7912	0.9114	0.9100	0.6720	0.9568	0.8827
638	0.8352	1.0388	1.0791	0.8080	1.0296	1.0100
639	0.9545	1.0710	0.9009	0.9156	1.0070	1.0100
640	0.7636	0.9990	0.9009	0.9156	1.0070	0.9785
641	0.7912	1.0500	0.9009	0.6720	0.9500	0.9898
642	1.0527	1.1130	1.3464	0.9120	1.1232	1.0100
643	1.0494	0.9000	1.0791	0.8720	1.0494	1.0100
644	0.9116	0.9540	0.9009	1.0403	0.9660	0.9991
645	0.7482	1.1100	0.9100	0.9292	1.0070	0.9991
646	0.8352	1.0500	1.0791	0.8080	0.9568	0.9898
647	0.9222	1.1130	1.3464	0.9120	1.1448	1.0486
648	0.8352	1.0388	1.3464	0.9120	1.0296	0.9898
649	0.8352	1.0388	1.0791	0.8720	1.0296	1.0486
650	1.2190	1.0388	1.0791	0.8720	1.0296	0.9919
651	0.7636	0.9212	0.9009	0.9156	0.9568	0.9506
652	0.8514	0.9180	0.9009	0.9660	1.0070	0.9894
653	0.7912	0.9540	0.9009	0.9292	0.9975	0.9100
654	0.9116	0.8480	1.0791	0.8080	0.9752	0.9500
655	0.7482	0.9996	0.9009	0.6720	0.9880	0.9700
656	0.9545	0.9800	0.9100	0.7728	0.9880	0.9506
657	0.9890	1.0388	1.0791	0.8652	0.9568	0.9991
658	0.8514	0.9990	0.9009	0.6720	0.9880	0.9500
659	0.9222	1.0388	1.3464	0.9120	1.1752	1.0700
660	0.9890	0.7739	0.9100	0.8652	0.9568	0.9646
661	0.8514	0.9212	1.0791	0.6720	0.9568	0.9506
662	0.7482	1.0878	0.9009	0.6720	0.9568	1.0355
663	0.8217	0.8480	0.9009	1.0403	0.9975	0.9100
664	0.8832	0.9900	1.3600	0.8720	1.0494	0.9700
665	0.9545	0.7810	0.9100	0.7728	0.9568	0.9919

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
666	0.8217	0.8480	0.9009	0.6720	0.9200	0.9919
667	0.9222	1.1130	1.3464	0.9120	1.1448	1.1564
668	0.8514	0.9180	0.9009	0.6720	1.0070	0.9500
669	1.0494	0.9540	1.0791	0.8720	0.9752	0.9690
670	0.9116	0.8000	0.9009	0.8652	0.9568	0.9373
671	1.0527	1.0780	1.0791	0.9120	1.1448	1.0700
672	0.8352	0.9990	1.3464	0.8720	1.0296	1.0302
673	0.9504	0.9990	1.0791	0.8720	1.0296	1.1009
674	0.9794	0.9870	0.9009	0.8652	0.9500	0.9898
675	0.7912	1.0500	0.9009	0.7728	0.9568	0.9506
676	0.8798	0.9540	0.9009	0.8652	0.9500	0.9690
677	1.1745	1.1130	1.4949	1.1040	1.2296	1.3700
678	0.9752	1.0500	1.3464	0.9120	1.1232	1.0486
679	1.1745	1.4840	1.8422	1.1040	1.1978	1.3426
680	1.0527	1.4000	1.3464	0.9120	1.1448	1.3426
681	0.9222	1.1322	1.0791	0.8720	1.1232	1.0738
682	0.8352	1.0323	1.0791	0.8720	1.0296	1.0738
683	0.8514	1.0434	0.9009	1.0403	1.0296	1.0738
684	1.3572	1.1766	1.4949	1.1040	1.3440	1.6583
685	0.8352	1.1322	1.0791	0.8080	0.9200	0.9737
686	0.7482	1.1211	0.9009	0.8080	0.9568	0.9191
687	0.8352	1.1100	0.9009	0.6720	0.9568	1.0486
688	0.7482	1.0605	0.9009	0.6720	0.9568	1.1800
689	0.9222	1.1130	1.3464	0.9120	1.1978	1.1564
690	1.4190	1.1766	0.9009	0.8652	0.9200	1.0700
691	0.9047	1.1100	0.9009	0.7728	0.9900	1.0914
692	0.9890	0.8720	0.9009	0.6720	0.9900	0.9373
693	0.7636	0.7526	0.9009	0.8652	0.9900	0.9476
694	1.0148	0.9810	0.9009	0.7728	1.1232	0.9894
695	0.8832	1.0388	1.0791	0.9292	0.9200	0.9894
696	0.9890	1.1130	0.9009	0.7728	0.9200	0.9898
697	0.7482	0.9900	0.9100	0.8080	0.9200	0.9500
698	0.9374	1.1130	1.0791	0.7728	0.9900	0.9991
699	0.9890	1.1766	0.9009	0.7728	0.9900	0.9700
700	0.9374	1.1322	0.9009	0.8652	0.9900	0.9737

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
701	0.7636	0.8480	0.9009	0.7728	0.9568	0.9500
702	0.8217	0.9900	0.9100	0.8652	0.8556	0.9384
703	0.8514	0.9090	0.9009	0.8652	0.9200	0.9690
704	0.9116	0.8480	0.9009	0.7728	0.9200	0.9690
705	1.1040	1.1655	1.3298	0.8652	1.1232	0.9191
706	0.9116	0.8880	1.0791	0.8080	0.9568	0.9282
707	1.0176	1.0780	1.0791	0.9156	1.0296	0.9500
708	0.7636	0.9180	0.9009	0.7728	0.9200	0.8645
709	0.9116	0.8480	1.3464	0.8080	1.2296	1.0100
710	0.7482	1.0780	0.9100	0.8652	0.8556	0.9500
711	0.7482	1.0388	0.9100	0.6720	0.9568	0.9500
712	0.8514	1.0388	1.3464	0.8720	1.2180	1.1564
713	0.7221	1.0388	0.9100	0.7728	0.9207	0.9894
714	0.8352	1.1130	1.0791	0.6720	0.8556	1.0100
715	0.8514	0.8880	0.9009	0.8652	0.8556	0.9373
716	0.9890	0.9090	1.0791	0.8720	1.1752	0.9898
717	0.9545	0.6016	0.9009	0.8652	1.0296	0.9064
718	0.7176	0.7100	0.9100	0.7728	0.9900	0.9282
719	0.8514	0.8800	0.9009	0.8652	0.8556	0.9373
720	0.7221	0.9000	0.9100	0.9660	0.9568	0.8918
721	0.7912	1.1130	0.9009	0.8652	0.8556	0.9894
722	0.9222	1.2321	1.0791	0.8080	1.0800	1.0700
723	0.9222	1.1130	1.0791	0.8720	1.0044	1.0100
724	0.9222	1.1766	1.0791	0.8720	1.0044	1.1800
725	0.7912	1.0388	0.9009	0.9292	0.9200	0.9310
726	0.9222	1.0500	1.3464	0.8720	0.9207	1.0486
727	0.7912	1.1130	0.9009	0.8652	0.8556	0.9898
728	1.1745	1.1766	1.4949	1.1040	1.0494	1.1564
729	1.1132	0.9800	1.6592	1.1040	0.9752	1.0486
730	1.0527	0.9800	1.0791	0.9120	0.9752	0.9506
731	1.0527	0.9540	1.4949	1.1040	1.0494	1.0700
732	1.1132	0.9540	1.3464	0.9120	1.0212	0.9700
733	1.1745	1.1211	1.3464	1.1040	0.9660	1.0302
734	0.8352	0.8880	1.0791	0.8720	0.9660	0.9690
735	1.0494	0.9540	1.3464	1.0488	1.0545	1.0100

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 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
736	1.1040	0.7810	1.0791	1.0028	0.9975	0.9476
737	0.9545	0.6400	0.9009	0.7728	0.9975	0.8976
738	1.1388	0.7104	0.9009	0.9660	0.9660	1.0028
739	0.9794	0.6784	0.9009	0.8652	0.9660	0.9752
740	0.9752	0.9810	1.3464	0.9120	1.0395	1.0355
741	0.8502	0.7104	1.1102	0.9156	0.9660	0.9328
742	0.9504	0.8800	1.0791	1.0028	1.0545	0.9919
743	1.0176	0.8480	1.0791	1.0028	0.9975	0.9282
744	0.9890	0.8480	1.0900	0.9292	0.9975	0.9200
745	0.8502	0.6784	0.9009	0.9660	0.9752	1.0028
746	0.9794	0.7810	1.1102	0.9156	0.9752	1.0028
747	0.7176	0.6464	0.9009	0.8652	1.0070	0.9592
748	1.0148	0.7040	1.0791	1.1009	1.0070	0.9752
749	1.2870	0.6464	0.9009	0.9660	0.9660	0.9328
750	1.3695	0.7040	0.9009	0.9660	0.9752	0.9646
751	0.8832	0.8480	1.0791	1.0028	0.9568	0.9500
752	1.1328	0.9900	1.0791	0.8720	1.0494	1.0355
753	1.1040	0.8880	1.0791	1.0028	0.9660	0.9919
754	0.9752	0.9540	1.3464	0.9120	1.0494	0.9700
755	0.8970	0.7104	0.9100	0.7728	1.0296	0.9752
756	0.9504	0.8800	1.0791	0.8720	1.1232	0.9282
757	0.9116	0.7881	1.0791	0.9120	1.1448	0.9690
758	0.9752	0.7739	1.3600	0.8720	1.0296	0.9919
759	0.8502	0.6464	0.9009	0.7728	0.9752	0.9328
760	0.9890	0.8880	0.9009	0.8080	0.9200	0.9919
761	0.9047	0.7040	0.9009	0.9156	0.9568	1.0028
762	0.9116	0.7810	0.9009	1.0403	1.0296	1.0028
763	1.0176	0.8880	1.0791	1.1227	1.0070	1.0028
764	1.0494	0.9540	1.0791	0.9120	1.0296	0.9500
765	1.0176	0.7810	1.0791	0.9292	1.0395	1.0283
766	0.8970	0.6528	0.9009	0.9156	1.0395	0.9328
767	0.7722	0.6528	0.9009	0.8652	0.9660	0.9328
768	1.3189	0.9000	1.8422	0.9120	1.1232	0.9506
769	0.9794	0.7526	0.9009	0.8652	0.9752	0.9785
770	1.1132	1.0388	1.3464	0.8720	1.0296	0.9506

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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
771	1.1132	0.9990	1.3464	0.9120	1.1232	0.9700
772	1.0464	0.9990	1.0791	1.1227	1.0296	0.9373
773	1.0494	0.8800	1.0791	1.1881	1.1448	1.0573
774	1.1388	0.6784	0.9009	0.9660	0.9660	0.9919
775	1.5840	0.8880	1.0791	0.8720	1.0070	0.9384
776	1.2190	0.9990	1.0791	0.9120	1.1232	0.9894
777	1.1236	0.9990	1.4170	0.9120	0.9660	0.9690
778	0.8832	0.7526	1.0791	0.8720	0.9752	0.9919
779	0.8217	0.7526	0.9100	0.8652	1.0494	0.9200
780	1.0494	0.9990	1.0791	0.8720	0.9660	0.9500
781	0.9504	0.9540	1.0791	1.0403	1.0070	0.9894
782	1.0176	0.8480	1.4949	0.8720	1.0800	0.9282
783	0.8502	0.6400	0.9009	0.7728	1.0494	1.0028
784	0.8352	1.0682	1.0791	0.8080	0.9900	1.0403
785	0.8832	0.9800	0.9009	0.8080	0.9207	0.9991
786	0.8352	1.0682	1.3464	0.8720	1.1300	1.0914
787	0.9204	0.6784	0.9009	0.8652	0.9900	0.9919
788	0.7176	0.6784	0.9100	0.7728	0.9900	1.0028
789	0.8268	0.7100	0.9100	0.7728	1.1232	1.0283
790	0.9890	0.7810	0.9009	1.1615	1.0494	0.9991
791	0.9794	0.7040	0.9009	0.9660	1.0494	0.9373
792	0.6786	0.7739	0.9009	0.7728	1.0296	0.9476
793	0.8268	0.6784	0.9009	0.8652	1.0494	1.0396
794	0.9545	0.7526	0.9009	0.8652	1.1232	0.9919
795	0.8217	0.6976	0.9009	0.8652	0.9900	0.9752
796	0.8514	0.9900	0.9009	0.6720	0.8556	0.9282
797	0.6786	0.6400	0.9100	0.8652	0.9900	0.9373
798	0.9890	0.7104	0.9009	0.8652	0.9752	0.9919
799	0.7636	0.9900	0.9009	0.6720	0.9200	0.9282
800	0.7176	0.6976	0.9100	0.7728	1.0800	0.9328
801	0.7482	0.9900	0.9009	0.8652	1.0044	0.9785
802	0.8217	0.8720	0.9009	0.7728	0.9900	1.0355
803	0.9204	0.7040	0.9009	0.9156	0.9752	0.9752
804	0.8970	0.7104	0.9100	0.9156	1.0070	0.9384
805	0.7221	0.7242	0.9009	0.7728	1.0296	1.0028

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 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
806	0.9047	0.7881	0.9009	0.8652	1.0070	0.9100
807	0.7176	0.7040	0.9009	0.8652	1.0296	0.9592
808	0.9794	0.6976	0.9009	0.9660	1.0494	0.9646
809	0.8268	0.6976	0.9009	0.7728	1.1232	1.0283
810	0.8798	0.6976	0.9100	0.7728	0.9752	1.0028
811	0.8217	0.7040	0.9009	0.7728	0.9752	1.0028
812	0.6786	0.6784	0.9100	0.7728	1.0296	0.9646
813	0.6786	0.7104	0.9009	0.7728	1.0800	0.9752
814	0.7176	0.6784	1.1830	0.7728	1.0494	1.2445
815	0.8268	0.7040	0.9009	0.7728	1.0494	1.1921
816	0.7176	0.7526	0.9009	0.7728	1.0070	0.9384
817	0.6786	0.6674	0.9100	0.6720	0.9660	0.9476
818	0.7176	0.6784	0.9009	0.7728	1.0395	1.1921
819	0.8502	0.6784	0.9009	0.9292	0.9752	0.9592
820	0.6786	0.7171	0.9100	0.6720	0.9752	1.0028
821	0.6786	0.6784	0.9100	0.6720	0.9660	0.9384
822	0.6786	0.7104	0.9009	0.8652	1.0494	1.1921
823	0.9890	0.8880	1.0791	0.7728	1.0395	1.4017
824	0.7221	0.7100	0.9100	0.6720	0.9660	0.9919
825	0.7221	0.7526	0.9100	0.6720	0.9752	0.9919
826	0.7636	0.7171	0.9009	0.7728	1.0070	0.9384
827	0.7482	0.8800	0.9009	0.6720	0.9975	0.9919
828	0.7176	0.6016	0.9009	0.6720	0.9660	1.0028
829	0.8268	0.6784	1.1102	0.6720	1.0395	1.2052
830	0.8217	0.6976	0.9009	0.9660	0.9660	1.0070
831	0.9545	0.7881	0.9009	0.7728	1.0494	1.0282
832	0.7722	0.6400	0.9009	0.7728	0.9975	0.9752
833	0.7722	0.6400	0.9100	0.8652	0.9660	0.9752
834	0.7221	0.7040	1.1830	0.6720	1.0494	1.0283
835	0.7176	0.6528	0.9009	0.7728	0.9975	0.9384
836	0.7482	0.7810	0.9009	0.8652	1.1448	1.2445
837	0.9374	0.8480	0.9009	0.9660	1.1780	0.9476
838	0.9545	0.8000	0.9100	0.9660	1.0545	0.9282
839	1.1236	1.0388	1.0791	1.0488	0.9975	0.9898
840	1.3915	0.9996	1.0791	1.1881	1.0070	0.9898

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 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
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PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
841	1.1979	1.0605	1.3464	1.1742	0.9975	0.9700
842	0.9504	0.7810	1.0791	1.0028	0.9975	0.9384
843	0.8798	0.7104	0.9009	0.9660	1.0070	1.0028
844	1.1554	0.9990	1.3464	1.0028	1.0070	0.9991
845	0.8514	0.9090	0.9009	0.8652	0.9975	0.8918
846	0.9116	0.9000	0.9100	0.8652	1.0070	0.8918
847	0.9794	0.7881	1.0791	0.9156	1.0070	0.9384
848	0.7912	0.7881	0.9009	1.0403	1.0545	0.9476
849	1.1979	1.1655	1.3464	1.1742	1.0070	0.9700
850	1.2556	0.8720	1.1830	0.9660	1.0545	0.9476
851	1.0494	0.9800	1.0791	1.1227	0.9975	0.9894
852	1.1979	0.8800	1.6592	1.2426	1.0070	0.9282
853	0.9794	0.6784	1.0791	0.9292	1.0070	0.9373
854	1.1554	0.9996	1.0791	1.2535	1.0545	0.9894
855	1.3695	0.7526	0.9009	0.9660	1.0070	0.9752
856	0.9504	0.9180	0.9009	1.1615	1.0070	0.9310
857	0.8970	0.6976	0.9009	0.8652	1.0545	0.9592
858	1.0176	0.8480	1.0791	1.0403	0.9975	0.9919
859	0.8798	0.7881	0.9100	0.9660	1.0070	0.9919
860	1.0148	0.7739	0.9009	0.9660	1.0070	1.0028
861	0.9794	0.7040	0.9009	1.0403	1.0545	0.9919
862	0.8352	0.7526	1.0791	1.0403	1.0070	0.9919
863	0.8217	0.6784	1.0791	1.0403	0.9975	0.9200
864	0.9890	0.9090	0.9009	1.1009	1.0070	0.9690
865	1.1040	0.9810	1.1102	0.9660	1.0070	1.0028
866	0.9374	0.9000	0.9100	0.9660	0.9975	1.0355
867	1.4352	1.1100	1.8422	1.1040	1.0395	1.0914
868	0.8798	0.7100	0.9009	0.8652	0.9975	0.9384
869	1.1979	1.0878	1.3464	1.1742	1.0070	0.9700
870	0.9047	0.8480	0.9009	0.9660	1.0070	0.9064
871	1.4352	1.1766	1.3464	1.4214	1.0494	1.0302
872	1.1236	0.9212	1.0900	1.1009	0.9975	0.9310
873	1.0494	0.9898	1.0791	1.2535	1.0070	0.9282
874	0.9794	0.7040	0.9009	0.9156	1.0545	0.9476
875	0.9204	0.7040	0.9009	0.9156	0.9752	0.9592

State: **CALIFORNIA**
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PURE PREMIUM BAND

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876	1.4190	0.8880	0.9009	0.9660	1.0545	0.9373
877	1.1745	0.9800	1.3464	0.9120	0.9975	1.0100
878	0.9374	0.8480	0.9009	0.9660	1.0070	0.9919
879	1.5525	1.0682	1.3464	1.2696	1.0494	1.0355
880	1.1236	1.0780	1.0791	1.1615	1.0070	0.9282
881	0.9504	0.8800	0.9100	1.1009	0.9975	0.9373
882	0.9545	0.8800	0.9009	0.9660	0.9975	0.9373
883	1.3695	0.6784	0.9009	0.9156	1.0545	0.9752
884	1.2870	0.7881	0.9100	0.9156	1.0070	0.9373
885	1.0176	0.9000	1.0791	0.9292	1.0545	0.9191
886	0.9116	0.8460	0.9009	0.7728	1.0070	0.9690
887	0.9047	0.7040	0.9009	0.9660	1.0545	1.0028
888	0.9374	0.6784	0.9009	1.1009	0.9975	1.0028
889	0.9752	0.9540	1.0791	1.1227	1.0070	0.9500
890	1.0464	0.8720	1.0791	1.1881	1.0070	0.9752
891	1.0148	0.7810	0.9009	0.9660	0.9975	0.9373
892	0.7912	0.7881	1.0791	1.0403	0.9975	0.9476
893	0.8514	0.8800	0.9100	0.9156	1.0545	0.9100
894	0.9794	0.7881	0.9009	0.9660	1.0545	1.0028
895	0.8217	0.7810	0.9009	0.9660	1.1780	1.0028
896	0.8798	0.7242	0.9009	0.9660	1.1780	0.9646
897	0.8798	0.7526	1.0791	0.9660	1.1780	0.9752
898	0.9047	0.8800	1.1830	0.9660	0.9752	1.0355
899	1.1328	1.0388	1.1830	0.9660	0.9752	0.9919
900	1.2190	1.0388	1.3600	1.1881	1.0545	1.0573
901	0.8514	0.8460	0.9009	0.9660	0.9975	0.9373
902	1.1236	1.0605	1.0791	1.2535	0.9975	1.0302
903	1.0494	0.9090	1.0791	1.0028	1.0070	0.9898
904	0.9116	0.9000	0.9009	1.1615	1.0545	1.0573
905	1.2826	1.1322	1.3464	1.0488	1.0545	1.1800
906	1.1132	1.1766	1.0900	1.1742	1.0070	1.0700
907	1.1979	1.1130	1.0791	1.1742	1.0070	1.0302
908	1.2420	1.2321	1.0791	1.1742	1.0070	0.9898
909	1.1132	1.1130	1.3464	1.1040	0.9660	1.0486
910	1.4310	1.1130	1.0791	1.0488	0.9975	0.9700

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
911	1.4352	1.1130	1.6533	1.1040	1.0395	1.1564
912	1.1132	1.0500	1.3464	1.1742	0.9975	0.9506
913	1.3572	1.1130	1.4949	1.1040	1.0395	1.0700
914	1.1132	1.0388	1.3464	1.1742	0.9660	0.9506
915	1.1132	1.1130	1.3464	1.2696	0.9752	1.0302
916	1.1236	0.9996	1.0791	1.1742	1.0545	1.0302
917	1.0494	0.9180	1.0791	1.1227	0.9975	0.9500
918	1.0464	0.8160	1.0900	1.1881	1.0212	0.9373
919	1.1554	1.0605	0.9009	1.1227	0.9975	1.0302
920	0.9504	0.8480	1.0900	1.0403	1.1780	0.9991
921	0.8798	0.7526	0.9009	0.9156	1.0545	0.9384
922	0.7636	0.6784	0.9009	0.8652	1.0212	0.9476
923	0.9047	0.7100	0.9009	0.9660	1.0545	0.9373
924	1.0176	0.7526	1.0791	1.1009	1.0070	0.9200
925	0.9116	0.7100	1.0791	0.9292	1.0545	0.9200
926	0.9890	0.7100	1.0791	1.0403	1.0545	0.9282
927	0.9047	0.7100	0.9009	0.9156	1.0545	0.9646
928	0.8352	0.9180	1.0791	1.0403	0.9975	0.9310
929	0.8832	0.8160	1.0900	0.9292	0.9975	0.8918
930	1.2870	0.6528	0.9100	1.1009	1.0070	0.9384
931	0.8352	0.8480	1.0791	1.1009	1.1408	0.9919
932	0.9545	0.6528	0.9009	0.9156	1.0070	0.9476
933	0.7912	0.7100	1.0791	1.1009	1.0070	0.8800
934	0.8798	0.6784	0.9009	1.0403	1.0545	0.9476
935	0.9890	0.7171	1.0791	1.1881	0.9752	0.9919
936	0.7912	0.7100	1.0791	1.0403	1.0070	0.9384
937	0.8268	0.7104	0.9009	0.9156	1.0545	0.9476
938	0.8502	0.7526	0.9009	0.9660	1.0545	0.9384
939	1.2870	0.6400	0.9009	0.8652	0.9752	0.9328
940	0.8352	0.7242	1.0791	0.9292	1.0070	0.9310
941	1.1040	0.8480	1.3464	1.1881	1.0070	0.9310
942	0.9116	0.7242	1.0791	1.1009	0.9975	0.8918
943	0.8970	0.5952	0.9009	0.8652	1.0545	0.9100
944	0.9222	0.8480	1.3464	1.0028	1.0545	0.9700
945	0.9374	0.9540	0.9009	1.1009	1.1780	0.9894

State: **CALIFORNIA**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
946	0.9374	0.7100	1.4170	1.1009	1.0070	0.9016
947	0.8798	0.6976	0.9009	1.1009	1.0545	0.9384
948	0.9204	0.6400	0.9009	1.1615	1.0070	0.9200
949	0.8502	0.6400	0.9009	0.9156	1.0545	0.8800
950	1.0464	0.7526	1.0791	1.1009	1.1780	0.9752
951	0.8502	0.6464	0.9009	0.9660	1.0070	0.9476
952	1.2870	0.6400	0.9009	0.9660	0.9752	0.9064
953	0.8502	0.7104	0.9009	0.9156	0.9752	0.9592
954	0.9794	0.6400	0.9009	1.1615	1.0212	0.9919
955	0.9116	0.8080	1.0791	1.1009	1.0070	0.9016
956	0.9545	0.7881	0.9009	0.8652	1.1340	0.9476
957	0.9890	0.6674	0.9009	1.1009	0.9975	0.9016
958	0.8217	0.6528	0.9009	1.1009	1.0070	0.8976
959	0.7722	0.6784	0.9009	0.8652	0.9660	1.0028
960	0.8268	0.6528	0.9009	0.9156	0.9660	0.9592
961	0.8970	0.6464	0.9009	0.9156	1.0494	0.9944
962	0.9204	0.6464	0.9009	0.8652	1.0494	0.9328
963	0.9545	0.6400	1.1102	0.9156	1.0545	0.9592
964	0.9204	0.6528	0.9009	0.9156	0.9752	0.9592
965	0.8970	0.6400	0.9009	0.9156	0.9752	0.9646
966	0.9204	0.6016	0.9009	0.8652	1.0070	0.9064
967	0.8970	0.5952	0.9009	0.9156	1.0070	0.8800
968	0.8502	0.6400	0.9100	0.9156	0.9660	0.9328
969	0.7722	0.6016	0.9100	0.9156	1.0212	0.8976
970	0.9204	0.6464	0.9009	0.9156	0.9975	0.9064
971	0.9047	0.6016	1.1102	0.9660	1.1232	0.9328
972	0.8970	0.6528	0.9100	0.9156	0.9880	0.9200
973	0.8502	0.6400	0.9100	0.9156	0.9660	0.8976
974	0.8970	0.6016	0.9009	0.9156	1.0070	0.8976
975	0.8970	0.6464	0.9009	0.8652	0.9660	0.9919
976	0.9204	0.6528	0.9009	0.9156	1.0545	0.8800
977	0.9204	0.6784	0.9009	0.9156	1.1448	0.9944
978	0.8970	0.6464	0.9009	0.8652	0.9752	0.9592
979	0.8970	0.6016	0.9009	0.8652	0.9752	0.9592
980	0.8970	0.6464	0.9009	0.8652	0.9975	0.8624

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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
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PURE PREMIUM BAND

USAA

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
981	0.8502	0.6016	0.9009	0.9156	0.9660	0.9752
982	0.8502	0.6016	0.9009	0.9156	1.0212	0.8976
983	0.8970	0.6016	0.9100	0.8652	1.0395	0.9064
984	0.8502	0.6400	0.9009	0.9156	1.1340	0.9592
985	0.8502	0.6784	0.9009	0.9660	0.9975	0.9064
986	0.8798	0.8720	0.9100	0.9660	0.9975	0.9919
987	1.1388	0.6784	0.9009	0.9660	1.1448	0.9752
988	1.1388	0.6784	0.9009	0.9660	1.1448	0.9592
989	0.8502	0.6400	0.9009	0.8652	1.1448	0.9752
990	0.9204	0.5952	0.9009	0.9156	0.9752	0.9592
991	1.2870	0.7104	0.9009	0.9156	1.1448	1.0028
992	0.9204	0.6400	0.9009	0.8652	1.0989	1.0028
993	0.9204	0.6400	0.9009	0.7728	1.0989	0.9384
994	1.1388	0.6464	0.9009	0.9660	1.1340	1.0028
995	1.1388	0.6400	0.9009	0.9156	0.9752	0.9064
996	0.8502	0.8880	0.9100	0.9660	0.9975	0.9785
997	0.8502	0.8800	0.9009	0.9660	0.9975	0.9282
998	0.9374	0.9990	0.9009	0.9660	0.9752	0.9373
999	0.9204	0.8800	0.9009	0.9660	1.0070	0.9919

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PURE PREMIUM BAND

CIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
1	1.1316	0.9570	1.3068	1.0906	1.0080	1.0800
2	1.4600	0.9570	1.7666	1.0906	1.0528	1.1448
3	1.2972	1.5330	1.9360	1.2236	1.1160	1.4580
4	1.4946	1.5750	1.9360	1.3699	1.1160	1.4580
5	1.3432	1.5330	1.4454	1.2236	1.1160	1.2528
6	1.3432	1.3266	1.5972	1.2236	1.0080	1.1832
7	1.4946	1.5150	1.5840	1.3699	1.1160	1.6590
8	1.4600	1.0340	1.4454	1.2236	1.0710	1.1448
9	1.3432	1.5330	1.4454	1.0906	1.0260	1.4175
10	1.4946	1.5330	1.7666	1.0906	1.0528	1.6590
11	1.4600	1.4070	1.7666	1.2236	1.0080	1.4175
12	1.5476	1.4070	1.3068	1.2236	1.0260	1.1448
13	1.4946	1.6060	1.4454	1.2236	1.0716	1.4175
14	1.4600	1.1235	1.4454	1.2236	1.0080	1.1832
15	1.5476	1.5330	1.4454	1.3699	1.1160	1.2528
16	1.0701	0.9870	1.0593	0.9184	1.0080	0.9792
17	1.0824	0.9135	1.3068	1.0906	1.0710	1.0200
18	1.5042	1.4746	1.2947	1.2312	1.0260	1.4175
19	1.5870	1.4600	1.3068	1.1772	0.9990	1.1832
20	1.4600	1.4600	1.3068	1.3699	1.0260	1.1832
21	1.6215	1.4746	2.0800	1.3699	1.0528	1.4580
22	1.5476	1.5330	2.0800	1.3699	1.0080	1.2528
23	1.2144	1.0605	1.5972	1.0906	1.0080	1.0200
24	1.0701	1.0605	1.0593	0.9184	1.0080	1.0200
25	1.2696	1.0340	1.7160	1.2236	1.0710	1.0800
26	1.2696	1.3578	1.0593	0.9936	0.9990	1.1716
27	1.5476	1.3800	1.7160	1.2208	1.0260	1.3770
28	1.4100	1.1770	1.4454	1.2236	1.0710	1.2528
29	1.4600	1.5330	1.7666	1.4497	1.0080	1.2528
30	1.2696	1.0593	1.0593	1.0906	1.1160	1.0706
31	1.0701	0.9135	1.3068	1.0906	1.0080	1.0368
32	1.2696	1.1235	1.3068	1.0906	1.1160	1.1832
33	0.9856	1.0700	1.0593	0.9936	0.9990	0.9696
34	1.5476	1.4850	1.4454	1.5162	1.1656	1.4220
35	1.5870	1.4746	1.3068	1.2768	1.0260	1.2528

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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

CIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
36	1.3407	1.4454	1.0593	1.1514	1.0260	1.3365
37	1.2696	1.1235	1.0593	1.0304	1.1160	1.1448
38	1.2144	0.9999	1.3068	1.2236	1.0710	1.0812
39	1.2848	1.1009	1.5972	1.0906	1.1186	1.1448
40	1.2696	0.9870	1.3068	1.3699	1.1186	1.0800
41	1.1316	1.4070	1.0593	1.1772	1.0260	1.0800
42	1.2300	1.0700	1.0593	1.1124	0.9990	1.0100
43	1.6422	1.5768	1.0593	1.2312	1.0260	1.5080
44	1.5870	1.4600	1.3068	0.9184	1.1656	1.4175
45	1.5042	1.5330	1.2947	1.2768	1.1160	1.2180
46	1.4600	1.4454	1.3068	1.0304	1.1656	1.4580
47	1.0304	1.0593	0.8910	0.9936	0.9990	1.0500
48	1.0824	0.8470	1.0593	1.0906	1.0080	1.0152
49	2.0424	1.6060	1.2947	1.2768	1.0080	1.7550
50	1.7374	1.6500	1.3068	1.2768	1.1160	1.5120
51	1.1316	0.9135	1.3068	1.0906	1.0710	1.0800
52	1.0824	1.3534	1.0593	1.1124	0.9990	1.0706
53	1.0824	1.3534	1.0593	1.2236	0.9990	1.0494
54	1.1316	1.1235	1.0593	1.0906	1.0080	1.0800
55	1.1316	1.0605	1.3068	1.0906	1.0080	1.0200
56	1.0824	1.0605	1.0593	1.2236	1.1160	0.9792
57	1.1118	1.0700	0.8910	1.1772	0.9630	0.9306
58	1.0824	0.9306	1.3068	1.2236	1.0080	1.0200
59	0.9856	0.9306	1.0593	0.9184	1.0080	0.9696
60	0.8976	1.0593	0.8910	1.0403	0.8820	1.0100
61	0.9744	1.0593	1.0593	0.8856	1.1160	0.9696
62	1.0824	0.9483	1.7160	1.0906	1.0528	1.0800
63	1.3328	1.0593	0.8910	1.1514	1.1656	1.3000
64	0.9964	0.9999	0.8910	1.1009	1.0545	0.9540
65	1.2880	1.3400	0.8910	1.1514	1.0260	1.1130
66	1.0810	1.0700	0.8910	0.9374	0.9630	1.0500
67	1.0812	1.0807	0.8910	1.1514	0.9990	1.1448
68	1.0200	0.9951	0.8910	1.0403	0.9630	1.1484
69	1.3038	1.4070	1.0593	1.1772	1.0260	1.1448
70	1.2300	1.3534	1.0593	1.1772	1.0716	1.2528

State: **CALIFORNIA**
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PURE PREMIUM BAND

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<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
71	0.8976	1.0100	1.0593	1.0403	1.0058	0.9792
72	1.2300	1.0340	1.0593	0.9184	1.1160	0.9792
73	1.2880	1.3534	1.0593	1.1124	1.0434	1.1448
74	1.2300	1.3534	1.0593	1.1772	0.9630	1.0706
75	1.1200	1.0807	1.2947	1.0304	1.0260	0.9504
76	0.9856	1.0201	1.3068	0.9184	0.9990	0.9792
77	0.9384	0.9951	1.0593	1.1124	0.9630	0.9504
78	0.9744	0.9306	1.0593	0.9184	1.0260	0.9792
79	0.9856	1.0605	1.0593	0.9184	1.0260	0.9792
80	0.9384	0.9400	0.8910	1.1124	0.9990	0.9588
81	1.0824	1.0593	1.3068	0.9184	1.0260	1.0800
82	1.1316	1.0807	1.3068	1.0304	0.9630	1.0368
83	1.0824	1.0807	1.3068	1.0304	0.9630	0.9696
84	1.0304	1.0201	1.0593	0.8856	0.9990	0.9792
85	1.0304	1.0201	1.0593	0.9184	1.0260	0.9792
86	0.9744	1.3400	0.8910	0.8856	0.9630	1.0100
87	1.0824	0.9306	1.0593	0.9184	1.1160	0.9696
88	1.1316	1.0807	1.3068	1.0304	0.9990	1.0100
89	1.0246	0.6138	0.8910	1.1124	0.9630	0.8787
90	0.9856	0.9999	1.3068	0.9184	0.9990	0.9900
91	0.9856	0.9494	0.8910	0.9184	0.9990	0.9588
92	0.8976	1.0201	0.8910	0.8856	0.9630	0.9090
93	0.8976	1.0100	0.8910	0.9292	0.9630	0.8910
94	1.2300	1.0700	1.0593	0.9184	1.0716	1.0706
95	0.9384	1.1235	0.8910	0.9936	1.0058	1.0100
96	0.9384	0.9844	0.8910	1.1009	0.8820	0.9408
97	1.0200	0.9393	0.8910	1.1009	0.9212	1.0368
98	1.1200	0.9135	1.0593	0.9184	1.1160	0.9696
99	0.9384	0.9494	1.0593	0.9936	0.9630	0.9494
100	1.3800	1.3266	1.0593	0.9184	1.0434	1.0812
101	0.8648	0.9292	0.8910	1.0403	0.9212	1.0494
102	0.9744	1.0605	1.3068	0.9184	1.0716	1.0494
103	0.8976	1.0201	0.8910	0.9936	0.9630	0.9696
104	1.0200	1.0201	0.8910	0.9292	0.9630	0.9306
105	1.0304	1.0807	1.0593	0.9936	0.9630	0.9696

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USAA CASUALTY INSURANCE COMPANY
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PURE PREMIUM BAND

CIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
106	1.0200	0.9393	0.8910	0.8282	0.8820	0.9494
107	1.2696	1.0700	1.0593	0.9184	1.0260	1.0200
108	1.1316	1.0700	1.0593	0.9936	0.9990	1.0800
109	0.9384	0.9292	1.0593	0.9184	1.0260	1.0528
110	1.2880	1.1235	1.0593	0.9936	1.0260	1.1200
111	1.5042	1.3534	1.7666	1.4497	1.0260	1.0812
112	1.2300	1.3400	1.0593	1.0304	0.9630	1.0800
113	1.6422	1.1235	1.8980	1.3699	1.0080	1.0500
114	1.4628	1.4070	1.7666	1.4497	1.0710	1.1130
115	1.1316	1.3266	1.0593	1.1536	1.0058	1.1448
116	1.2138	1.0593	0.8910	0.9936	1.0434	1.0800
117	1.4145	1.1235	1.0593	1.1536	1.0716	1.0800
118	1.2138	1.0593	1.5972	1.0304	1.0716	1.0800
119	1.6215	1.4606	2.0800	1.4497	1.0080	1.2992
120	1.4628	1.4070	1.7666	1.4497	1.0080	1.1448
121	1.5369	1.6060	1.9360	1.4497	1.1186	1.4175
122	1.4600	1.4070	2.0800	1.2236	1.0710	1.2180
123	1.3800	1.4070	1.3068	1.3699	0.9990	1.1448
124	1.1730	0.9393	0.8910	1.1514	0.9630	1.0152
125	1.3407	1.4606	1.0593	1.2312	1.0260	1.1872
126	1.4628	1.4740	1.3068	1.2236	1.1160	1.1448
127	1.5476	1.4070	1.3068	1.5162	1.0260	1.1448
128	1.5870	1.4070	1.3068	1.2208	1.0260	1.0800
129	1.6790	1.6060	1.5972	1.5162	1.1160	1.2180
130	1.0246	0.9400	0.8910	1.1514	0.8820	0.9792
131	1.1200	1.1235	1.0593	1.1536	0.9990	1.0152
132	1.2848	1.6060	1.3068	1.4497	1.1160	1.1832
133	1.3800	1.0246	1.3068	1.3699	1.0710	1.0800
134	1.5476	1.4740	1.7666	1.4497	1.1160	1.1448
135	1.3407	1.0340	1.0593	1.3699	1.0080	1.0368
136	1.4628	1.0605	1.3068	1.3699	1.0080	1.0800
137	1.4145	1.1110	1.3068	1.2236	1.0260	1.1448
138	1.1200	1.1235	1.0593	1.1772	0.9212	1.0152
139	1.5476	1.1663	1.8980	1.3699	1.0710	1.1448
140	0.9384	0.9494	1.0593	1.1124	0.8820	1.0152

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
141	1.0812	1.0100	0.8910	1.1009	0.8820	0.9588
142	1.1730	0.9870	1.0593	1.1009	0.9212	1.0152
143	1.6422	1.3400	1.3068	1.2768	1.1160	1.1130
144	1.2880	1.1770	1.0593	1.1514	1.0058	1.0368
145	1.2880	1.1235	1.3068	1.2208	1.0058	1.0080
146	0.9964	0.9870	0.8910	1.1009	1.0058	0.9720
147	1.4145	1.1770	1.3068	1.1536	1.0716	1.0800
148	1.6790	1.6060	2.0800	1.4497	1.0710	1.2180
149	1.2696	1.4600	1.3068	1.2208	1.1656	1.2180
150	1.6215	1.4606	2.0800	1.2236	1.0080	1.4175
151	1.3038	1.3266	1.0593	1.2208	1.1160	1.0100
152	0.9384	0.9306	0.8910	0.9936	1.0058	1.0152
153	1.0812	0.9494	0.8910	0.9936	1.0165	1.0800
154	0.8648	0.8613	0.8910	0.9292	0.9212	0.9720
155	1.1200	0.9306	0.8910	0.8856	1.0260	0.9588
156	1.0304	1.0201	1.0593	0.8856	1.0058	0.9792
157	1.0824	0.9870	1.3068	0.9184	1.0080	1.0368
158	0.8976	0.9306	0.8910	1.1124	1.0058	1.0152
159	0.8874	1.0201	0.8910	0.9292	0.9630	1.0152
160	0.9384	0.9494	0.8910	1.0403	0.9630	0.9588
161	0.8874	0.8613	1.0593	0.9184	1.0716	0.9588
162	1.2144	1.0807	1.4454	1.0906	1.0260	1.0200
163	0.9384	0.8787	0.8910	0.9936	1.0434	1.0152
164	0.9744	0.9870	1.3068	0.9184	1.0260	0.9696
165	0.9856	0.9135	1.3068	1.0906	1.1656	0.9792
166	1.1200	1.0201	1.3068	1.0304	0.9630	1.0368
167	0.9744	0.9135	1.0593	0.9184	1.1656	1.0368
168	0.9856	0.9870	1.0593	1.1536	1.0716	0.9792
169	0.9384	0.9494	0.8910	1.1009	0.9212	1.0152
170	1.2144	1.3400	1.4454	1.0906	0.9990	1.0494
171	1.2696	1.3534	1.4454	1.0906	0.9990	0.9900
172	0.8700	0.7777	0.8910	1.1514	0.9384	0.9828
173	0.8648	0.8648	0.8910	0.9292	1.0914	0.9696
174	0.8829	0.6200	0.8910	0.7912	1.0914	0.9555
175	1.0353	0.6800	0.8910	1.1009	1.0914	1.0080

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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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176	0.8272	0.9292	0.8910	0.9936	1.2996	0.9540
177	0.8178	0.9844	1.0593	0.9936	1.2648	1.0440
178	0.8648	0.9393	0.8910	0.9936	1.2255	0.9540
179	0.8648	0.8091	1.0593	1.1009	1.0388	0.9494
180	0.9400	0.8742	0.8910	1.0403	1.2642	0.9540
181	0.9222	0.7140	0.8910	0.9804	0.9996	0.9396
182	0.7656	0.7700	0.8910	1.1124	1.1872	1.0080
183	0.8976	0.9393	0.8910	0.8856	1.2084	0.9504
184	0.9222	0.6200	0.8910	1.1009	1.0830	0.9555
185	1.0353	0.8613	0.8910	1.1009	1.1322	0.9450
186	0.7656	0.8648	0.8910	1.1009	0.8740	0.9408
187	0.8004	0.9844	0.8910	0.8858	0.8740	0.9800
188	0.8874	0.9292	1.0593	0.9936	1.0914	0.9504
189	0.8874	0.9393	1.0593	0.9184	1.2648	0.9900
190	0.9660	0.6800	0.8910	0.9374	0.9996	0.9282
191	1.0353	0.6324	0.8910	1.0403	1.1628	1.0192
192	0.8874	0.9393	0.8910	0.8856	1.0914	1.1484
193	1.0812	1.0700	0.8910	0.9292	1.0388	0.9696
194	0.8700	0.5766	0.8910	0.9292	1.2648	1.0192
195	0.9964	0.9135	0.8910	1.1514	0.8740	0.9720
196	0.8904	0.6262	0.8910	1.0403	1.0545	0.9396
197	0.9483	1.0201	0.8910	0.9804	0.9690	0.9090
198	0.8700	0.9951	0.8910	1.1514	0.9025	0.9504
199	1.0246	0.9951	0.8910	0.9804	1.0355	0.9000
200	0.8700	0.9400	0.8910	0.8858	0.9025	0.8910
201	0.9222	0.9400	0.8910	0.9804	0.9690	0.9792
202	0.9483	1.0201	0.8910	0.9804	0.8740	1.0368
203	0.9384	0.9292	0.8910	1.1009	1.0914	0.9900
204	0.8976	0.8648	0.8910	1.0403	0.9310	1.0494
205	1.0005	0.8742	0.8910	0.9804	0.9752	0.8640
206	0.9400	1.0100	1.0593	1.1772	0.8740	1.0706
207	0.9964	0.9393	0.8910	1.1009	1.0682	0.9540
208	0.8272	0.8742	0.8910	1.1514	0.9310	1.0152
209	0.8904	0.6868	0.8910	0.9804	1.0914	1.0192
210	1.0005	0.9951	0.8910	0.9804	0.9384	0.9540

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USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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211	0.9384	1.4454	0.8910	1.1514	0.9936	1.4175
212	1.5476	1.6200	0.8910	1.1009	1.1663	2.0540
213	0.9400	0.9951	0.8910	1.0403	0.9936	0.9540
214	0.9384	1.0100	1.0593	1.2312	1.0260	0.9540
215	0.8648	1.0700	1.0593	1.1772	1.0260	1.0388
216	1.0812	1.0605	0.8910	1.1124	0.9310	1.2220
217	1.0005	0.8085	0.8910	1.1009	1.0914	1.0152
218	0.8700	1.0100	0.8910	0.9374	1.0388	0.8460
219	0.9483	0.9494	0.8910	0.9804	1.0914	1.0368
220	0.9222	0.7140	0.8910	1.1009	0.9996	0.9135
221	1.2432	0.9135	0.8910	0.9804	1.0165	1.1700
222	0.8272	0.9306	1.0593	1.0403	0.8740	1.0100
223	0.9964	0.8393	0.8910	1.1514	1.0914	0.9450
224	0.8648	0.9951	0.8910	1.0403	0.9936	0.9000
225	0.9222	0.9292	0.8910	0.9804	0.8740	0.9090
226	0.8004	0.9292	0.8910	1.1009	1.0260	0.9000
227	0.8648	0.9292	0.8910	1.0403	0.8648	0.9792
228	0.8976	1.0201	1.0593	1.1124	0.8648	0.9696
229	1.0005	1.1110	0.8910	0.9804	1.0165	1.1700
230	0.8648	0.9393	0.8910	1.1009	1.0488	1.0440
231	0.9400	0.9292	0.8910	1.1009	1.0028	0.9540
232	0.9384	1.2462	1.0593	0.9292	0.9310	1.0440
233	1.0701	1.2328	1.7666	1.3699	1.1322	1.0388
234	0.9222	0.9844	0.8910	0.9374	0.9936	0.9540
235	0.9400	0.9951	0.8910	0.8858	0.9310	0.9000
236	1.0200	0.9393	0.8910	1.1009	1.1663	1.0440
237	0.8648	1.0700	0.8910	0.9374	1.0584	1.0440
238	0.8004	0.9292	0.8910	0.7912	0.8740	0.9800
239	0.8648	0.9951	0.8910	1.0403	1.0584	0.9540
240	0.9856	0.9292	1.0593	0.9936	1.0165	0.9504
241	0.9856	1.2462	1.0593	1.1772	0.9996	1.0440
242	0.8648	0.9844	0.8910	1.0403	0.9996	0.9540
243	0.8004	0.9844	0.8910	0.9804	1.0682	0.9000
244	0.9660	0.9951	0.8910	0.7052	1.2255	0.9000
245	0.8700	0.8742	0.8910	0.9374	0.9936	0.9800

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USAA CASUALTY INSURANCE COMPANY
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PURE PREMIUM BAND

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246	1.0005	0.9393	0.8910	0.7912	0.9310	0.9408
247	0.9400	0.8742	0.8910	1.1009	1.0682	0.9000
248	0.9400	0.9951	0.8910	1.1514	1.1868	0.9540
249	0.8004	0.9951	0.8910	0.9374	1.2255	0.9540
250	0.9400	1.0700	1.0593	1.1009	0.9936	0.9540
251	1.0005	0.9292	0.8910	0.9804	0.9936	0.9000
252	0.8700	0.9292	0.8910	0.8858	0.9936	0.9000
253	0.9400	0.9292	0.8910	0.9374	1.0830	0.8640
254	0.8700	1.0700	0.8910	0.8858	1.0260	0.9800
255	0.8700	1.0100	0.8910	0.9374	1.0260	0.8640
256	1.0812	1.3400	0.8910	1.1124	1.0682	1.1716
257	1.2144	1.6500	0.8910	0.7052	1.0260	1.2528
258	1.2696	1.5150	1.0593	0.8856	1.2255	1.6590
259	1.1730	1.6060	0.8910	0.7912	1.0388	1.1832
260	1.3038	1.5750	0.8910	0.8858	1.1663	1.7696
261	0.8178	0.9844	0.8910	0.8856	1.3144	0.9540
262	0.9964	1.4600	0.8910	0.8282	1.0830	1.2528
263	0.7569	0.6324	1.0593	0.8856	1.1872	0.9494
264	0.8004	0.8085	0.8910	0.9936	1.3516	1.0152
265	0.9222	0.7777	0.8910	1.1009	1.2099	0.9180
266	0.9156	0.7161	0.8910	0.9804	1.0914	0.9720
267	0.9156	0.8004	0.8910	0.9804	1.0388	0.9306
268	0.8004	0.7161	0.8910	1.0403	0.9212	0.9494
269	0.8648	0.7623	0.8910	0.9936	1.0165	0.9720
270	0.9315	0.6262	0.8910	0.9292	1.0165	0.8787
271	0.8400	0.6138	0.8910	1.0403	1.1780	0.9282
272	0.9483	0.6868	0.8910	0.9292	1.0914	0.9282
273	0.8100	0.6510	0.8910	0.8282	1.0640	0.9555
274	0.9222	0.7777	0.8910	0.9292	1.3516	0.9720
275	0.8004	0.8085	0.8910	1.1124	1.1766	1.0152
276	0.8700	0.7140	1.0593	0.9936	1.3566	1.0152
277	1.0005	0.6868	0.8910	1.1124	1.2099	0.9282
278	0.9964	0.9135	1.0593	1.1772	1.3392	1.0152
279	0.8904	0.7140	0.8910	1.1009	1.0165	0.9828
280	0.8400	0.6732	0.8910	0.8282	1.0640	0.9720

State: **CALIFORNIA**
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 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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PURE PREMIUM BAND

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281	0.7128	0.6138	0.8910	0.8282	1.0640	0.9135
282	0.9996	0.6510	0.8910	0.9292	1.1780	0.9828
283	1.0005	0.7140	0.8910	0.9936	1.1663	0.9282
284	1.0005	0.7084	0.8910	1.0403	1.1766	0.9720
285	0.8004	0.6820	0.8910	1.2312	1.2768	1.0152
286	0.9400	0.6262	1.0593	0.9292	1.3144	0.9555
287	0.7392	0.6510	0.8910	1.0403	1.2648	0.9828
288	0.9483	0.8700	0.8910	0.9804	1.0914	0.9588
289	1.0246	0.9135	1.2947	1.2312	1.1628	1.0080
290	0.9996	0.8787	0.8910	0.9374	1.0914	0.9494
291	0.9315	0.5766	0.8910	0.9292	1.0165	0.9396
292	0.9483	0.6868	0.8910	1.1514	1.0914	0.9555
293	0.8700	0.6510	0.8910	0.9292	1.2208	0.9450
294	0.9483	0.8085	0.8910	1.1514	1.2099	0.9090
295	1.1186	0.9400	0.8910	1.0403	1.0488	1.0494
296	1.2208	1.5768	0.8910	0.8282	1.1556	2.0540
297	0.8004	0.6262	0.8910	0.9936	1.0830	0.9282
298	0.7728	0.6510	0.8910	0.8282	1.1780	0.9396
299	0.9384	1.1110	0.8910	0.8282	1.0640	1.0800
300	0.8400	0.7140	0.8910	0.9374	1.0682	0.9282
301	0.9856	0.9135	1.0593	1.2236	1.0716	1.0368
302	1.1118	1.1235	0.8910	1.1009	1.0584	1.2180
303	1.0810	0.9396	0.8910	0.9936	1.0165	0.9870
304	1.0810	0.8085	0.8910	1.1124	1.0058	0.9828
305	1.1730	0.8613	0.8910	0.9936	1.0058	0.9180
306	0.9156	0.8091	0.8910	0.9292	1.2255	0.9000
307	0.9964	0.6868	1.0593	0.9936	1.0584	0.9588
308	0.8648	0.9494	0.8910	0.8856	1.0058	0.9180
309	0.7728	0.8613	0.8910	0.7912	0.9310	0.9180
310	0.8904	0.8787	0.8910	1.0403	0.9212	0.9720
311	1.0304	0.8470	1.0593	1.0906	1.1656	1.0152
312	0.8976	0.9400	0.8910	1.1536	1.0830	1.0152
313	0.9384	0.9400	0.8910	0.9936	0.9212	0.9696
314	0.7656	0.8700	0.8910	1.0403	0.9212	0.9090
315	0.9856	0.8613	1.0593	0.9184	1.0716	1.0368

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316	0.8648	0.9306	0.8910	0.9184	1.0165	0.9792
317	0.9156	0.6200	0.8910	0.9292	1.0914	0.8874
318	1.1186	0.8787	0.8910	1.0403	0.9936	1.0100
319	0.9384	0.9135	1.0593	0.9184	1.0716	1.0152
320	1.0353	0.9483	0.8910	0.9936	1.0682	1.1200
321	0.8648	0.8742	0.8910	0.9292	1.0165	1.0368
322	0.8700	0.9570	0.8910	1.1124	1.0165	0.9450
323	1.0810	0.7777	0.8910	1.2208	0.9936	0.9090
324	1.0812	0.9570	1.0593	1.2768	1.1322	0.9450
325	0.9384	0.9135	1.0593	1.0304	1.0545	1.0152
326	0.9483	0.7140	0.8910	0.9292	1.0388	0.9828
327	0.9222	0.8613	0.8910	1.1124	1.0545	0.9870
328	1.0810	0.9400	0.8910	0.9936	0.9212	0.9588
329	1.1186	0.7344	1.0593	0.9936	1.1322	0.9828
330	0.9483	0.6262	0.8910	1.0403	0.9384	0.8874
331	1.3944	0.6324	0.8910	0.7052	1.0914	0.9828
332	1.0353	0.6262	1.0593	0.8282	1.0584	0.9396
333	1.1730	0.7777	1.0593	1.1124	0.9996	0.9828
334	1.0810	0.7480	1.0593	1.1124	1.0165	0.9180
335	0.9400	0.9870	0.8910	1.1772	1.0165	1.0152
336	0.9996	0.6820	0.8910	1.0403	1.0165	0.8787
337	0.9483	0.8787	0.8910	0.9936	0.9310	0.9450
338	1.1988	0.6262	0.8910	0.9292	1.0165	0.8613
339	0.9856	0.9870	1.0593	1.1124	1.0058	1.0152
340	1.2300	0.9135	1.3068	1.5162	1.1628	1.0368
341	1.0304	0.8613	1.0593	0.9184	1.0434	0.9792
342	1.0810	0.7623	0.8910	1.1772	0.9996	0.9555
343	1.0304	0.9135	1.0593	1.0304	1.0716	1.0152
344	1.1200	0.9135	1.0593	1.0304	1.0260	1.0368
345	0.9744	1.0201	1.0593	1.0304	0.9990	0.9792
346	0.9384	0.9870	1.0593	0.9184	0.9990	1.0152
347	0.9856	0.9306	1.0593	0.9184	0.9990	0.9792
348	0.8648	0.7084	0.8910	0.9936	0.9212	0.9494
349	0.8272	0.8085	0.8910	1.0403	0.9996	0.9555
350	0.9222	0.7140	0.8910	1.1009	1.0165	1.0080

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

CIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
351	1.0200	0.9494	1.0593	1.0304	1.0165	0.9494
352	0.9384	0.8085	1.0593	0.8856	1.0716	0.9180
353	0.9483	0.6800	0.8910	0.8856	1.0914	0.9720
354	0.9384	1.0593	0.8910	1.1009	1.0584	0.9900
355	0.9384	1.0100	1.0593	1.0403	1.0488	1.0388
356	0.9400	0.8085	1.0593	1.1536	1.0434	0.9720
357	1.1118	0.8613	1.0593	1.1536	1.0434	0.9720
358	1.1872	0.9870	1.0593	1.1124	0.9996	1.1448
359	1.0246	0.8742	1.0593	1.1772	0.8648	0.9090
360	0.9384	0.9306	0.8910	1.0403	0.9310	0.9720
361	0.8976	0.9292	0.8910	1.1772	0.9384	1.0100
362	1.0812	0.9393	0.8910	1.0403	1.0830	0.9000
363	0.9964	0.8613	1.0593	1.0403	0.8740	0.9180
364	1.1730	0.9400	1.0593	1.1772	0.9384	0.9588
365	0.8976	0.9951	1.3068	1.0403	0.9212	0.9792
366	0.8648	1.0100	0.8910	0.9374	0.8648	0.9870
367	0.8976	1.0100	1.0593	0.9936	0.8280	0.9494
368	0.9964	1.0201	0.8910	0.9374	0.8930	0.9720
369	1.1200	1.3400	1.0593	1.1772	0.9212	1.0800
370	0.9384	1.0100	1.0593	0.9292	0.8280	0.9792
371	0.9384	0.9844	1.0593	1.1009	0.8648	0.9696
372	0.8904	0.9400	0.8910	0.9374	0.8648	0.9090
373	0.8648	0.9393	0.8910	0.9374	1.0058	0.9870
374	0.9384	1.0700	1.0593	1.1009	0.9630	0.9494
375	1.4442	1.2328	0.8910	0.9804	0.9630	0.8640
376	1.0200	0.9306	1.0593	1.1514	0.8820	0.9696
377	1.1872	1.0100	1.0593	1.1124	0.9630	0.9494
378	0.9964	1.0201	0.8910	1.1009	0.9212	0.9792
379	1.0812	1.0201	0.8910	1.1009	0.9630	0.9588
380	0.8648	0.9292	0.8910	1.1514	0.8648	0.9180
381	0.9400	0.9292	0.8910	0.9374	0.8648	0.9792
382	1.0810	1.0605	0.8910	0.9374	1.0058	1.2480
383	0.9400	1.0100	0.8910	1.1514	1.0058	1.0500
384	0.9384	1.0700	0.8910	1.1009	1.0058	0.9870
385	0.8178	0.9292	0.8910	0.9804	0.9630	0.9588

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 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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386	0.8700	0.9494	0.8910	0.9374	0.9384	0.8640
387	0.8700	0.9393	0.8910	0.9374	0.9212	0.9720
388	0.8976	0.9870	0.8910	1.1124	1.0545	0.9555
389	0.9964	0.9951	0.8910	1.1514	0.9384	0.8640
390	1.2144	1.0201	1.4454	1.2236	0.9990	0.9504
391	0.8004	0.9400	0.8910	0.9374	0.8648	0.9504
392	1.0812	0.9393	0.8910	1.1124	0.9630	1.0368
393	0.8874	1.0100	1.0593	1.0403	0.9212	1.0152
394	1.2144	1.0807	1.3068	1.2236	1.0260	1.0100
395	0.8874	0.9306	0.8910	0.9936	0.8820	0.9090
396	0.8648	0.8613	0.8910	1.0403	0.8820	0.9828
397	0.8976	1.0201	1.0593	0.8856	0.8740	0.9588
398	0.9384	0.9494	1.0593	1.1124	1.0028	1.0152
399	0.8976	1.0201	0.8910	1.1009	0.9212	1.0152
400	0.9400	0.9400	0.8910	1.0403	0.8648	0.8910
401	1.0810	0.8648	0.8910	1.0403	0.8820	0.9900
402	1.0005	0.9400	0.8910	0.8858	0.8648	0.9306
403	0.9400	0.9494	0.8910	1.1514	0.8280	1.0368
404	0.9660	0.8787	0.8910	0.8858	0.8648	0.9191
405	1.1118	0.9870	0.8910	1.1514	0.9212	0.9720
406	0.8904	0.7777	0.8910	0.8858	0.8648	0.9282
407	0.9384	0.9135	1.2947	0.9184	1.0716	0.9696
408	0.9400	0.9135	1.0593	1.1124	0.9212	0.9306
409	1.0246	0.8085	1.0593	1.0403	1.0434	0.9720
410	1.0200	0.9306	1.0593	1.1536	0.8740	1.0706
411	1.2138	1.0201	1.0593	0.9936	0.9310	1.1448
412	0.7656	0.6732	0.8910	0.9292	1.0058	0.8874
413	1.0246	0.9135	0.8910	1.0403	0.9212	0.9555
414	0.8004	1.0100	0.8910	0.9374	0.8740	0.9504
415	0.9400	0.9999	0.8910	0.8858	1.0165	0.9504
416	0.9483	0.9393	0.8910	0.9804	0.9212	0.9306
417	0.9384	1.1770	1.0593	1.0403	1.0165	1.0800
418	0.9483	0.9870	1.0890	0.9804	1.0058	1.0152
419	0.7728	0.8700	0.8910	0.8858	0.8648	0.8910
420	0.9222	0.6732	1.0593	0.9936	1.0165	0.9090

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 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
421	1.0810	0.7412	1.7160	1.2312	1.1305	1.0152
422	0.8904	0.6510	0.8910	0.8282	1.0545	0.9282
423	0.8004	0.6800	1.0593	1.1124	1.0434	0.9720
424	0.9222	0.6820	0.8910	0.9292	1.0830	0.9450
425	0.7656	0.6758	1.0593	0.8856	1.2648	0.9720
426	0.8829	0.6262	0.8910	0.9374	1.0388	0.9282
427	0.7656	0.6510	1.0593	0.9936	1.0165	0.9396
428	0.8004	0.7480	1.0593	0.8856	1.2138	0.9588
429	0.7728	0.6820	1.0593	0.8856	1.1872	0.9450
430	0.8976	0.8470	1.3068	0.8856	1.0545	0.9180
431	0.8904	0.6868	0.8910	0.9374	1.0388	0.9828
432	1.1186	0.7140	0.8910	1.1772	1.0165	0.9720
433	1.1186	0.9396	1.0890	0.9936	1.0434	0.9720
434	0.8700	0.6510	1.0593	0.8856	1.0545	0.9282
435	0.8904	0.5766	0.8910	1.1514	1.0545	0.9135
436	1.3944	0.6138	0.8910	1.1009	1.0434	0.9396
437	0.9384	0.7480	1.3068	1.0304	1.1305	0.9792
438	0.9222	0.7140	0.8910	0.9292	1.0165	0.9191
439	1.0812	0.8085	1.0593	1.1772	1.0434	0.9555
440	0.8400	0.6800	0.8910	0.8856	1.0165	0.8874
441	0.9483	0.7161	0.8910	1.0403	1.0682	0.9212
442	0.7728	0.6758	1.0593	0.9374	1.1305	0.9828
443	1.0005	0.6758	1.0593	0.8856	1.2648	0.9720
444	0.9315	0.6262	0.8910	1.1009	1.0914	0.9396
445	0.9964	0.7140	0.8910	1.0403	1.0165	0.9828
446	0.7047	0.6200	0.8910	0.9374	0.9996	0.9828
447	1.3944	0.6138	0.8910	1.0403	1.0165	0.8874
448	0.8648	0.6868	1.0593	0.9936	1.1322	0.9090
449	0.8272	0.6820	1.0593	0.9936	1.0830	0.9720
450	0.7392	0.6758	0.8910	0.7912	1.0165	0.9828
451	1.1186	0.8470	1.3910	1.1124	1.0640	0.9720
452	0.7656	0.6510	0.8910	1.0403	0.9996	0.9396
453	0.9222	0.6758	1.2947	0.8856	0.9310	0.9180
454	0.9400	0.7344	1.0593	0.9936	1.0830	0.9588
455	0.8400	0.6820	0.8910	0.8282	0.9996	0.9396

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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456	0.8648	0.6696	1.0593	0.9292	1.1628	0.9191
457	0.8272	0.7140	1.0593	0.9936	1.1628	0.9180
458	0.8648	0.8613	1.0593	1.0403	0.8740	0.8910
459	0.9483	0.6262	0.8910	1.0403	1.0434	0.9396
460	1.3912	0.8085	1.2947	0.9292	1.1780	0.9282
461	0.9384	0.7623	1.0593	0.8856	1.0165	0.9720
462	1.0200	0.9999	1.0593	0.8856	1.0830	0.9696
463	0.9400	0.8613	1.0890	0.9936	1.0545	0.9180
464	1.1118	0.8613	1.0593	1.2312	1.0434	1.0368
465	0.9400	0.9870	1.0890	1.0403	1.0830	0.9180
466	0.9400	0.9570	1.1700	1.1772	1.0434	0.9720
467	0.7728	0.7623	0.8910	0.9804	0.8740	0.9009
468	0.8004	0.9306	0.8910	0.9804	0.8740	0.9090
469	0.9660	0.7623	0.8910	0.7912	0.8740	0.9282
470	0.8100	0.7140	0.8910	0.9804	0.9384	0.9282
471	0.8904	0.6820	0.8910	0.9374	1.0914	0.9135
472	0.7728	0.6732	0.8910	0.8858	0.9690	0.8874
473	0.9315	0.6324	0.8910	0.9804	0.9996	0.8613
474	0.8004	0.7412	0.8910	0.8282	0.8740	0.9180
475	0.8829	0.8085	0.8910	0.9804	0.8740	0.8874
476	0.7452	0.6510	1.0890	0.9804	1.0914	0.9135
477	1.3944	0.8085	0.8910	0.9374	0.8740	0.9191
478	0.7656	0.7140	1.0593	0.8856	0.9310	1.0152
479	0.8829	0.7140	0.8910	0.9804	0.9310	0.9396
480	0.7728	0.7161	0.8910	0.8858	0.9996	0.9306
481	0.9660	0.6732	0.8910	0.7912	1.0260	0.9090
482	0.8400	0.6324	0.8910	0.9292	0.9310	0.9828
483	0.9660	0.7777	0.8910	0.9804	0.9310	0.8787
484	0.7392	0.6732	0.8910	0.7052	0.9690	0.9282
485	0.7728	0.8085	0.8910	0.9804	0.9996	0.9828
486	0.7728	0.7140	0.8910	0.9804	1.0914	0.8787
487	0.7392	0.7140	0.8910	0.9804	1.1342	0.9555
488	0.7656	0.8085	0.8910	0.8282	0.9310	0.9306
489	0.7656	0.7623	0.8910	1.0403	0.8740	0.9090
490	0.7569	0.7140	1.0593	0.8856	1.0914	0.9306

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PURE PREMIUM BAND

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491	0.9660	0.8085	0.8910	0.8858	0.9310	0.9828
492	0.9156	0.6800	0.8910	0.8858	0.8740	0.8874
493	0.8586	0.6510	0.8910	1.0403	1.0388	0.8787
494	0.9315	0.5704	0.8910	1.1009	0.9310	0.8787
495	0.8829	0.5766	0.8910	0.7912	1.0914	0.8787
496	1.3944	0.6262	0.8910	1.2768	0.9996	0.8874
497	1.1988	0.6262	0.8910	0.9804	1.0682	0.9555
498	1.3944	0.6510	0.8910	1.1009	1.0165	0.8874
499	1.0005	0.6200	1.0890	1.2312	0.9936	0.8787
500	1.3446	0.6200	0.8910	1.0403	1.0914	0.9396
501	1.6932	0.7412	1.0593	1.2208	1.0434	0.9555
502	1.3038	0.9870	1.3068	1.4497	1.0434	1.0152
503	0.9639	0.5704	0.8910	0.9804	1.0682	0.9396
504	1.3038	0.8393	1.3068	1.4497	1.0260	0.9450
505	1.2138	0.6800	1.0593	1.1536	1.0434	0.9828
506	0.9156	0.6510	0.8910	1.0403	1.0165	0.9396
507	0.9315	0.8085	0.8910	0.9374	1.0682	0.9180
508	1.4628	1.0340	1.3068	1.4497	1.1656	1.0368
509	1.3328	0.9135	1.0593	1.2208	0.9990	1.0192
510	1.3446	0.6262	0.8910	1.1009	1.0914	0.9191
511	0.8904	0.6732	0.8910	0.9374	0.9752	0.9282
512	0.9222	0.7480	1.0593	1.1514	0.9752	0.9450
513	0.9156	0.6324	0.8910	1.1009	1.0388	0.9135
514	1.4442	0.6510	1.0593	0.9184	1.1628	0.9828
515	1.0810	0.7140	1.3068	0.9184	1.0830	0.9282
516	0.8648	0.7480	1.0593	0.8856	1.1342	0.9720
517	1.0812	0.9135	1.0593	0.9936	0.8740	0.8910
518	1.1200	0.9306	1.3068	0.9184	1.0165	0.9212
519	0.9156	0.6732	1.0890	0.9804	1.0028	0.9828
520	0.8272	0.7140	1.0593	1.0304	1.1780	0.9180
521	1.0810	0.8085	1.0593	1.1009	0.9384	0.9282
522	0.8904	0.6510	1.0593	0.8856	1.0914	0.9282
523	0.8400	0.6138	0.8910	0.7052	1.0028	0.8787
524	1.1118	0.7140	1.3068	1.0906	1.1322	1.0152
525	1.1186	0.8613	1.0593	1.1009	0.9996	1.1830

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526	0.8400	0.6510	0.8910	0.9292	1.0165	0.9555
527	1.0246	0.8393	1.0593	0.9936	0.9996	0.9828
528	0.8648	0.7140	1.0593	0.8282	1.0388	0.9191
529	0.8648	0.8085	1.0593	0.9184	1.1322	0.9494
530	1.0005	0.6820	1.3068	0.9936	1.2648	0.9180
531	1.0353	0.6820	0.8910	1.1009	1.1663	1.0192
532	0.9964	0.8085	0.8910	0.9292	0.9752	0.9828
533	0.9964	0.6696	1.3068	1.1536	1.2648	0.9720
534	0.9384	0.7344	1.3068	1.1536	1.1780	0.9450
535	0.9222	0.7140	1.0593	1.0403	0.9690	0.9555
536	0.8976	0.7140	1.4454	1.0906	1.1780	0.9588
537	1.1118	0.8470	1.3068	1.0304	1.1628	0.9494
538	0.8586	0.6200	0.8910	0.9374	1.0682	0.9396
539	1.2006	0.9135	1.5840	1.0906	1.2084	1.0494
540	1.0824	0.8787	1.4454	1.0906	1.0830	0.9408
541	0.8976	0.9494	1.3068	1.1536	0.9310	0.9212
542	1.0824	0.9306	1.4454	1.0304	1.0545	0.9504
543	1.0304	0.7623	1.7666	1.0906	1.2648	0.9504
544	0.8976	0.8787	1.3068	0.8856	0.9996	0.9212
545	1.2696	1.0605	1.5840	1.0906	1.1628	1.0200
546	1.1200	0.9306	1.4454	1.2236	1.1322	0.9696
547	0.9856	0.7777	1.4454	1.0906	1.0914	0.9306
548	1.0304	0.8700	1.3068	1.0906	1.0545	0.9408
549	0.7656	0.9135	1.0593	0.8282	1.0388	0.9408
550	0.8272	0.8470	1.3068	0.8856	1.2096	1.1484
551	0.8004	0.9135	1.0593	0.8856	1.1766	0.9800
552	0.8400	0.8085	0.8910	0.8282	0.9310	0.9306
553	0.9660	0.8085	0.8910	1.0403	0.9384	0.9191
554	1.3944	0.8700	1.0890	0.9804	0.9996	0.9408
555	1.3944	0.8085	0.8910	0.9374	0.9996	0.9720
556	0.8400	0.7140	0.8910	0.7052	0.9996	0.9180
557	0.7728	0.6696	1.0593	0.8282	1.1766	0.9588
558	0.8829	0.6758	1.2947	1.0403	1.2084	0.9588
559	0.9315	0.6510	1.0890	1.0403	1.1342	0.9009
560	0.9315	0.6510	1.0890	0.9804	1.2099	0.9191

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

CIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
561	0.8904	0.8613	0.8910	0.7052	0.9384	0.9212
562	0.9156	0.8742	0.8910	0.9374	1.0028	0.9000
563	1.0005	0.8742	0.8910	0.7912	1.0355	0.9408
564	0.8904	0.8648	0.8910	0.9374	0.9025	0.8640
565	1.1988	0.7623	0.8910	0.8858	0.8740	0.8820
566	0.8700	0.8004	1.0593	0.8282	0.9384	0.9000
567	0.9660	0.6510	0.8910	0.9292	1.1628	0.9588
568	0.7656	1.0605	0.8910	0.8858	0.9996	0.9800
569	0.7656	0.9306	1.0593	0.8856	1.0914	0.9408
570	0.8904	0.9400	0.8910	0.9374	0.9384	1.0706
571	0.9856	1.0605	1.3068	0.8856	1.1322	1.1368
572	0.8648	0.9870	1.0593	0.8282	1.0545	1.0388
573	0.8904	0.9483	0.8910	0.8858	0.9310	0.9494
574	0.9660	0.9483	0.8910	0.8858	0.9310	1.0152
575	0.8400	0.8085	0.8910	0.9374	1.0914	0.9588
576	0.7392	0.8648	0.8910	0.7912	0.8740	0.9306
577	0.9483	1.0152	0.8910	0.8858	0.9310	0.9870
578	0.9156	0.9570	1.0890	0.9374	0.8740	0.9720
579	0.8400	1.0605	0.8910	0.7912	0.8740	0.9800
580	0.8648	0.9870	0.8910	0.7052	0.9310	0.9212
581	0.7656	1.0201	0.8910	0.7052	0.9025	0.9408
582	0.8004	0.9292	0.8910	0.7912	0.8740	0.9408
583	0.7728	0.9483	0.8910	0.9804	1.1342	0.9588
584	0.8904	0.9870	0.8910	0.8858	0.9996	0.9792
585	0.8272	1.1770	1.0593	0.9292	1.2084	1.0388
586	0.9660	0.9870	1.0593	0.9374	0.9384	0.9800
587	0.8648	1.0605	1.0593	0.8282	1.0165	1.0388
588	0.8904	1.0100	0.8910	0.8858	0.8740	0.9408
589	0.9222	0.8316	0.8910	0.7912	0.9310	0.9720
590	0.8272	1.1235	1.0593	0.8282	0.8740	0.9800
591	0.8178	1.0201	1.0593	0.7052	0.8740	0.9800
592	0.8700	1.0100	0.8910	0.7052	0.9025	0.9408
593	0.8272	0.9999	1.0593	0.7052	0.8740	0.9900
594	0.9384	1.4454	1.0593	0.9292	1.0682	1.3230
595	0.9856	1.4070	1.0593	0.8282	1.1556	1.3230

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

CIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
596	0.8976	1.4740	1.0593	0.9292	1.1342	1.2528
597	0.8004	0.9306	1.0593	0.9292	1.0388	1.2528
598	0.8272	1.1235	1.0593	1.1009	1.0682	1.1484
599	0.8976	1.3400	1.0593	0.9292	1.0682	1.3230
600	1.0812	1.3400	1.0593	0.8282	1.1342	1.3230
601	1.0246	1.1556	1.0593	0.9292	1.0914	1.0812
602	1.0304	1.4070	1.7666	0.9184	1.1322	1.3230
603	0.9400	1.0700	0.8910	1.0403	0.9996	1.1368
604	1.1118	1.2462	1.0593	1.1009	1.0914	1.1368
605	1.0812	1.3534	1.3068	0.9292	1.0165	1.1368
606	0.8700	1.0700	0.8910	0.7052	1.0388	1.1484
607	0.9856	1.4070	1.4454	0.9184	1.2084	1.5484
608	0.9400	1.1235	0.8910	0.8282	0.9310	1.0388
609	0.9384	1.3400	1.0593	0.7912	0.9996	1.0440
610	0.9856	1.3534	1.3068	0.8856	1.2099	1.1368
611	1.2880	1.4070	1.3068	0.8856	1.1322	1.3230
612	0.9964	1.4070	1.2947	0.9292	1.1342	1.3230
613	0.8272	0.9292	1.0890	0.8856	1.0388	1.1484
614	0.8272	1.1235	0.8910	0.8282	0.9310	0.9800
615	0.7728	0.9393	0.8910	0.7052	0.8740	0.9900
616	0.8700	1.0700	0.8910	0.7052	0.8740	0.8640
617	0.7728	1.0593	0.8910	0.8858	0.9025	0.9800
618	0.8648	1.1235	0.8910	0.8858	0.9996	1.0388
619	0.8004	0.9870	0.8910	0.8858	0.8740	0.9212
620	0.9222	1.0201	0.8910	0.8858	0.9384	0.9408
621	1.0200	1.0100	1.3068	0.8856	1.0388	0.9540
622	0.9964	0.9306	1.0593	0.8856	0.9752	0.9800
623	0.8648	1.0340	1.0593	0.9936	0.9752	0.9792
624	1.0246	0.9396	1.0593	0.9936	0.9936	0.9828
625	0.9222	0.8742	0.8910	0.7912	1.0355	1.0152
626	0.7728	0.9400	0.8910	0.8858	1.0355	0.9588
627	0.8904	0.8470	0.8910	0.7912	0.9384	1.0152
628	0.8976	1.0605	1.0593	0.8856	1.0388	0.9900
629	0.7656	0.9570	0.8910	0.8858	0.9752	0.9306
630	0.9964	0.8393	1.0593	0.9936	1.0028	0.9588

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

CIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
631	0.8648	0.8700	1.0593	0.8856	0.9752	0.9588
632	0.8648	0.9570	1.0593	0.8282	1.0028	0.9720
633	0.9222	0.9135	0.8910	0.7052	0.9384	0.9306
634	0.7656	0.9870	1.0593	0.7912	0.9752	0.9408
635	0.8272	1.0340	1.0593	1.0403	0.9752	0.9504
636	0.8648	1.0605	1.0593	0.8282	0.8740	0.9408
637	0.8004	0.8648	0.8910	0.7052	0.9752	0.8640
638	0.8178	0.9870	1.0593	0.8282	1.0388	0.9900
639	0.9660	1.0201	0.8910	0.9374	1.0355	0.9900
640	0.7728	0.9570	0.8910	0.9374	1.0355	0.9588
641	0.8004	0.9999	0.8910	0.7052	0.9690	0.9800
642	0.9856	1.0605	1.3068	0.9184	1.1342	0.9900
643	1.0200	0.8613	1.0593	0.8856	1.0682	0.9900
644	0.9222	0.9135	0.8910	1.0403	0.9936	0.9792
645	0.7569	1.0593	0.8910	0.9292	1.0260	0.9792
646	0.8272	0.9999	1.0593	0.8282	0.9752	0.9800
647	0.8976	1.0605	1.3068	0.9184	1.1663	1.0388
648	0.8272	0.9870	1.3068	0.9184	1.0388	0.9800
649	0.8272	0.9870	1.0593	0.8856	1.0388	1.0388
650	1.1730	0.9870	1.0593	0.8856	1.0388	0.9720
651	0.7728	0.8742	0.8910	0.9374	0.9752	0.9408
652	0.8700	0.8787	0.8910	0.9804	1.0355	0.9696
653	0.8004	0.9135	0.8910	0.9292	1.0260	0.8910
654	0.9222	0.8085	1.0593	0.8282	1.0028	0.9306
655	0.7656	0.9494	0.8910	0.7052	1.0070	0.9504
656	0.9660	0.9306	0.8910	0.7912	1.0070	0.9408
657	1.0005	0.9870	1.0593	0.8858	0.9752	0.9792
658	0.8700	0.9570	0.8910	0.7052	1.0070	0.9306
659	0.8874	0.9870	1.3068	0.9184	1.1766	1.0494
660	1.0005	0.7344	0.8910	0.8858	0.9752	0.9450
661	0.8700	0.8742	1.0593	0.7052	0.9752	0.9408
662	0.7569	1.0340	0.8910	0.7052	0.9752	1.0152
663	0.8400	0.8085	0.8910	1.0403	1.0260	0.8910
664	0.8648	0.9483	1.3068	0.8856	1.0682	0.9504
665	0.9660	0.7412	0.8910	0.7912	0.9752	0.9720

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
666	0.8400	0.8085	0.8910	0.7052	0.9384	0.9720
667	0.8874	1.0605	1.3068	0.9184	1.1663	1.1368
668	0.8700	0.8787	0.8910	0.7052	1.0355	0.9306
669	1.0200	0.9135	1.0593	0.8856	1.0028	0.9494
670	0.9222	0.7623	0.8910	0.8858	0.9752	0.9180
671	0.9744	1.0246	1.0593	0.9184	1.1663	1.0494
672	0.8272	0.9570	1.3068	0.8856	1.0388	1.0100
673	0.9400	0.9570	1.0593	0.8856	1.0388	1.0800
674	0.9996	0.9393	0.8910	0.8858	0.9690	0.9800
675	0.8004	0.9999	0.8910	0.7912	0.9752	0.9408
676	0.8904	0.9135	0.8910	0.8858	0.9690	0.9494
677	1.0701	1.0605	1.4454	1.0906	1.2426	1.3365
678	0.9384	0.9999	1.3068	0.9184	1.1342	1.0388
679	1.0701	1.4070	1.7666	1.0906	1.2099	1.3230
680	0.9856	1.3266	1.3068	0.9184	1.1663	1.3230
681	0.8874	1.0807	1.0593	0.8856	1.1342	1.0440
682	0.8272	0.9844	1.0593	0.8856	1.0388	1.0440
683	0.8700	0.9951	0.8910	1.0403	1.0388	1.0440
684	1.2006	1.1235	1.4454	1.0906	1.3392	1.6116
685	0.8272	1.0807	1.0593	0.8282	0.9384	0.9540
686	0.7656	1.0700	0.8910	0.8282	0.9752	0.9000
687	0.8272	1.0593	0.8910	0.7052	0.9752	1.0388
688	0.7656	1.0100	0.8910	0.7052	0.9752	1.1484
689	0.8976	1.0605	1.3068	0.9184	1.2099	1.1368
690	1.4442	1.1235	0.8910	0.8858	0.9384	1.0494
691	0.9156	1.0593	0.8910	0.7912	0.9996	1.0706
692	1.0005	0.8316	0.8910	0.7052	0.9996	0.9180
693	0.7728	0.7140	0.8910	0.8858	0.9996	0.9282
694	1.0353	0.9396	0.8910	0.7912	1.1342	0.9696
695	0.8648	0.9870	1.0593	0.9292	0.9384	0.9696
696	1.0005	1.0605	0.8910	0.7912	0.9384	0.9800
697	0.7656	0.9483	0.8910	0.8282	0.9384	0.9306
698	0.9483	1.0605	1.0593	0.7912	0.9996	0.9792
699	1.0005	1.1235	0.8910	0.7912	0.9996	0.9504
700	0.9483	1.0807	0.8910	0.8858	0.9996	0.9540

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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701	0.7728	0.8085	0.8910	0.7912	0.9752	0.9306
702	0.8400	0.9483	0.8910	0.8858	0.8740	0.9191
703	0.8700	0.8700	0.8910	0.8858	0.9384	0.9494
704	0.9222	0.8085	0.8910	0.7912	0.9384	0.9494
705	1.0810	1.1110	1.2947	0.8858	1.1342	0.9000
706	0.9222	0.8470	1.0593	0.8282	0.9752	0.9090
707	0.9964	1.0246	1.0593	0.9374	1.0388	0.9306
708	0.7728	0.8787	0.8910	0.7912	0.9384	0.8460
709	0.9222	0.8085	1.3068	0.8282	1.2426	0.9900
710	0.7656	1.0246	0.8910	0.8858	0.8740	0.9306
711	0.7569	0.9870	0.8910	0.7052	0.9752	0.9306
712	0.8700	0.9870	1.3068	0.8856	1.2312	1.1368
713	0.7392	0.9870	0.8910	0.7912	0.9310	0.9696
714	0.8178	1.0605	1.0593	0.7052	0.8740	0.9900
715	0.8700	0.8470	0.8910	0.8858	0.8740	0.9180
716	1.0005	0.8700	1.0593	0.8856	1.1766	0.9800
717	0.9660	0.5766	0.8910	0.8858	1.0388	0.8874
718	0.7452	0.6732	0.8910	0.7912	0.9996	0.9090
719	0.8700	0.8393	0.8910	0.8858	0.8740	0.9180
720	0.7392	0.8613	0.8910	0.9804	0.9752	0.8820
721	0.8004	1.0605	0.8910	0.8858	0.8740	0.9696
722	0.8874	1.1770	1.0593	0.8282	1.0914	1.0494
723	0.8874	1.0605	1.0593	0.8856	1.0165	0.9900
724	0.8976	1.1235	1.0593	0.8856	1.0165	1.1484
725	0.8004	0.9870	0.8910	0.9292	0.9384	0.9212
726	0.8976	0.9999	1.3068	0.8856	0.9310	1.0388
727	0.8004	1.0605	0.8910	0.8858	0.8740	0.9800
728	1.0824	1.1235	1.4454	1.0906	1.0584	1.1368
729	1.0304	0.9306	1.5972	1.0906	0.9936	1.0388
730	0.9856	0.9306	1.0593	0.9184	0.9936	0.9408
731	0.9856	0.9135	1.4454	1.0906	1.0584	1.0494
732	1.0304	0.9135	1.3068	0.9184	1.0488	0.9504
733	1.0701	1.0700	1.3068	1.0906	0.9936	1.0100
734	0.8272	0.8470	1.0593	0.8856	0.9936	0.9494
735	1.0200	0.9135	1.3068	1.0304	1.0830	0.9900

State: **CALIFORNIA**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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736	1.0810	0.7412	1.0593	0.9936	1.0260	0.9282
737	0.9660	0.6138	0.8910	0.7912	1.0260	0.8787
738	1.1988	0.6820	0.8910	0.9804	0.9936	0.9828
739	0.9996	0.6510	0.8910	0.8858	0.9936	0.9555
740	0.9384	0.9396	1.3068	0.9184	1.0584	1.0152
741	0.8829	0.6820	1.0890	0.9374	0.9936	0.9135
742	0.9400	0.8393	1.0593	0.9936	1.0830	0.9720
743	0.9964	0.8085	1.0593	0.9936	1.0260	0.9090
744	1.0005	0.8085	1.0593	0.9292	1.0260	0.9009
745	0.8829	0.6510	0.8910	0.9804	1.0028	0.9828
746	0.9996	0.7412	1.0890	0.9374	1.0028	0.9828
747	0.7452	0.6200	0.8910	0.8858	1.0355	0.9396
748	1.0353	0.6758	1.0593	1.1009	1.0260	0.9555
749	1.3446	0.6200	0.8910	0.9804	0.9936	0.9135
750	1.3944	0.6758	0.8910	0.9804	0.9936	0.9450
751	0.8648	0.8085	1.0593	0.9936	0.9752	0.9306
752	1.1186	0.9483	1.0593	0.8856	1.0682	1.0152
753	1.0810	0.8470	1.0593	0.9936	0.9936	0.9720
754	0.9384	0.9135	1.3068	0.9184	1.0682	0.9504
755	0.9315	0.6820	0.8910	0.7912	1.0388	0.9555
756	0.9400	0.8393	1.0593	0.8856	1.1342	0.9090
757	0.9222	0.7480	1.0593	0.9184	1.1663	0.9494
758	0.9384	0.7344	1.3068	0.8856	1.0388	0.9720
759	0.8829	0.6200	0.8910	0.7912	1.0028	0.9135
760	1.0005	0.8470	0.8910	0.8282	0.9384	0.9720
761	0.9156	0.6758	0.8910	0.9374	0.9752	0.9828
762	0.9222	0.7412	0.8910	1.0403	1.0388	0.9828
763	0.9964	0.8470	1.0593	1.1124	1.0355	0.9828
764	1.0200	0.9135	1.0593	0.9184	1.0388	0.9306
765	0.9964	0.7412	1.0593	0.9292	1.0584	1.0080
766	0.9315	0.6262	0.8910	0.9374	1.0584	0.9135
767	0.8100	0.6262	0.8910	0.8858	0.9936	0.9135
768	1.2208	0.8613	1.7666	0.9184	1.1342	0.9408
769	0.9996	0.7140	0.8910	0.8858	1.0028	0.9588
770	1.0304	0.9870	1.3068	0.8856	1.0388	0.9408

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

CIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
771	1.0304	0.9570	1.3068	0.9184	1.1342	0.9504
772	1.0246	0.9570	1.0593	1.1124	1.0388	0.9180
773	1.0200	0.8393	1.0593	1.1772	1.1663	1.0368
774	1.1988	0.6510	0.8910	0.9804	0.9936	0.9720
775	1.5604	0.8470	1.0593	0.8856	1.0355	0.9191
776	1.1730	0.9570	1.0593	0.9184	1.1342	0.9696
777	1.0812	0.9570	1.3910	0.9184	0.9936	0.9494
778	0.8648	0.7140	1.0593	0.8856	1.0028	0.9720
779	0.8400	0.7140	0.8910	0.8858	1.0682	0.9009
780	1.0200	0.9570	1.0593	0.8856	0.9936	0.9306
781	0.9400	0.9135	1.0593	1.0403	1.0260	0.9696
782	0.9964	0.8085	1.4454	0.8856	1.0914	0.9090
783	0.8829	0.6138	0.8910	0.7912	1.0682	0.9828
784	0.8272	1.0152	1.0593	0.8282	0.9996	1.0200
785	0.8648	0.9306	0.8910	0.8282	0.9310	0.9792
786	0.8178	1.0152	1.3068	0.8856	1.1322	1.0706
787	0.9639	0.6510	0.8910	0.8858	0.9996	0.9720
788	0.7452	0.6510	0.8910	0.7912	0.9996	0.9828
789	0.8586	0.6732	0.8910	0.7912	1.1342	1.0080
790	1.0005	0.7412	0.8910	1.1514	1.0682	0.9792
791	0.9996	0.6758	0.8910	0.9804	1.0682	0.9180
792	0.7128	0.7344	0.8910	0.7912	1.0388	0.9282
793	0.8586	0.6510	0.8910	0.8858	1.0682	1.0192
794	0.9660	0.7140	0.8910	0.8858	1.1342	0.9720
795	0.8400	0.6696	0.8910	0.8858	0.9996	0.9555
796	0.8700	0.9483	0.8910	0.7052	0.8740	0.9090
797	0.7128	0.6138	0.8910	0.8858	0.9996	0.9180
798	1.0005	0.6820	0.8910	0.8858	1.0028	0.9720
799	0.7728	0.9483	0.8910	0.7052	0.9384	0.9090
800	0.7452	0.6696	0.8910	0.7912	1.0914	0.9135
801	0.7656	0.9483	0.8910	0.8858	1.0165	0.9588
802	0.8400	0.8316	0.8910	0.7912	0.9996	1.0152
803	0.9639	0.6758	0.8910	0.9374	1.0028	0.9555
804	0.9315	0.6820	0.8910	0.9374	1.0355	0.9191
805	0.7392	0.6868	0.8910	0.7912	1.0388	0.9828

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 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
806	0.9156	0.7480	0.8910	0.8858	1.0355	0.8910
807	0.7452	0.6758	0.8910	0.8858	1.0388	0.9396
808	0.9996	0.6696	0.8910	0.9804	1.0682	0.9450
809	0.8586	0.6696	0.8910	0.7912	1.1342	1.0080
810	0.8904	0.6696	0.8910	0.7912	1.0028	0.9828
811	0.8400	0.6758	0.8910	0.7912	1.0028	0.9828
812	0.7047	0.6510	0.8910	0.7912	1.0388	0.9450
813	0.7128	0.6820	0.8910	0.7912	1.0914	0.9555
814	0.7452	0.6510	1.1700	0.7912	1.0682	1.2220
815	0.8586	0.6758	0.8910	0.7912	1.0682	1.1700
816	0.7452	0.7140	0.8910	0.7912	1.0355	0.9191
817	0.7128	0.6324	0.8910	0.7052	0.9936	0.9282
818	0.7452	0.6510	0.8910	0.7912	1.0584	1.1700
819	0.8829	0.6510	0.8910	0.9292	0.9936	0.9396
820	0.7047	0.6800	0.8910	0.7052	0.9936	0.9828
821	0.7047	0.6510	0.8910	0.7052	0.9936	0.9191
822	0.7128	0.6820	0.8910	0.8858	1.0682	1.1700
823	1.0005	0.8470	1.0593	0.7912	1.0584	1.3780
824	0.7392	0.6732	0.8910	0.7052	0.9936	0.9720
825	0.7392	0.7140	0.8910	0.7052	1.0028	0.9720
826	0.7728	0.6800	0.8910	0.7912	1.0355	0.9191
827	0.7569	0.8393	0.8910	0.7052	1.0260	0.9720
828	0.7452	0.5766	0.8910	0.7052	0.9936	0.9828
829	0.8586	0.6510	1.0890	0.7052	1.0584	1.1830
830	0.8400	0.6696	0.8910	0.9804	0.9936	0.9870
831	0.9660	0.7480	0.8910	0.7912	1.0682	1.0080
832	0.8100	0.6138	0.8910	0.7912	1.0260	0.9555
833	0.8100	0.6138	0.8910	0.8858	0.9936	0.9555
834	0.7308	0.6758	1.1700	0.7052	1.0584	1.0080
835	0.7452	0.6262	0.8910	0.7912	1.0260	0.9191
836	0.7656	0.7412	0.8910	0.8858	1.1663	1.2220
837	0.9483	0.8085	0.8910	0.9804	1.2255	0.9282
838	0.9660	0.7623	0.8910	0.9804	1.0830	0.9090
839	1.0812	0.9870	1.0593	1.0304	1.0260	0.9800
840	1.2880	0.9494	1.0593	1.1772	1.0260	0.9800

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 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

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<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
841	1.1200	1.0100	1.3068	1.1536	1.0260	0.9504
842	0.9400	0.7412	1.0593	0.9936	1.0260	0.9191
843	0.8904	0.6820	0.8910	0.9804	1.0260	0.9828
844	1.1118	0.9570	1.3068	0.9936	1.0260	0.9792
845	0.8700	0.8700	0.8910	0.8858	1.0260	0.8820
846	0.9222	0.8613	0.8910	0.8858	1.0260	0.8820
847	0.9996	0.7480	1.0593	0.9374	1.0260	0.9191
848	0.8004	0.7480	0.8910	1.0403	1.0830	0.9282
849	1.1200	1.1110	1.3068	1.1536	1.0355	0.9504
850	1.2876	0.8316	1.1700	0.9804	1.0830	0.9282
851	1.0200	0.9306	1.0593	1.1124	1.0260	0.9696
852	1.1200	0.8393	1.5972	1.2208	1.0355	0.9090
853	0.9996	0.6510	1.0593	0.9292	1.0260	0.9180
854	1.1118	0.9494	1.0593	1.2312	1.0830	0.9696
855	1.3944	0.7140	0.8910	0.9804	1.0260	0.9555
856	0.9400	0.8787	0.8910	1.1514	1.0260	0.9212
857	0.9315	0.6696	0.8910	0.8858	1.0830	0.9396
858	0.9964	0.8085	1.0593	1.0403	1.0260	0.9720
859	0.8904	0.7480	0.8910	0.9804	1.0260	0.9720
860	1.0353	0.7344	0.8910	0.9804	1.0260	0.9828
861	0.9996	0.6758	0.8910	1.0403	1.0830	0.9720
862	0.8272	0.7140	1.0593	1.0403	1.0355	0.9720
863	0.8400	0.6510	1.0593	1.0403	1.0260	0.9009
864	1.0005	0.8700	0.8910	1.1009	1.0260	0.9494
865	1.0810	0.9396	1.0890	0.9804	1.0260	0.9828
866	0.9483	0.8613	0.8910	0.9804	1.0260	1.0152
867	1.2696	1.0593	1.7666	1.0906	1.0584	1.0706
868	0.8904	0.6732	0.8910	0.8858	1.0260	0.9191
869	1.1200	1.0340	1.3068	1.1536	1.0260	0.9504
870	0.9156	0.8085	0.8910	0.9804	1.0260	0.8874
871	1.2696	1.1235	1.3068	1.3699	1.0682	1.0100
872	1.0812	0.8742	1.0593	1.1009	1.0260	0.9212
873	1.0200	0.9400	1.0593	1.2312	1.0355	0.9090
874	0.9996	0.6758	0.8910	0.9374	1.0830	0.9282
875	0.9639	0.6758	0.8910	0.9374	0.9936	0.9396

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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

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876	1.4442	0.8470	0.8910	0.9804	1.0830	0.9180
877	1.0824	0.9306	1.3068	0.9184	1.0260	0.9900
878	0.9483	0.8085	0.8910	0.9804	1.0260	0.9720
879	1.4145	1.0152	1.3068	1.2236	1.0682	1.0152
880	1.0812	1.0246	1.0593	1.1514	1.0260	0.9090
881	0.9400	0.8393	0.8910	1.1009	1.0260	0.9180
882	0.9660	0.8393	0.8910	0.9804	1.0260	0.9180
883	1.3944	0.6510	0.8910	0.9374	1.0830	0.9555
884	1.3446	0.7480	0.8910	0.9374	1.0260	0.9180
885	0.9964	0.8613	1.0593	0.9292	1.0830	0.9000
886	0.9222	0.8091	0.8910	0.7912	1.0260	0.9494
887	0.9156	0.6758	0.8910	0.9804	1.0830	0.9828
888	0.9483	0.6510	0.8910	1.1009	1.0260	0.9828
889	0.9384	0.9135	1.0593	1.1124	1.0260	0.9306
890	1.0246	0.8316	1.0593	1.1772	1.0260	0.9555
891	1.0353	0.7412	0.8910	0.9804	1.0260	0.9180
892	0.8004	0.7480	1.0593	1.0403	1.0260	0.9282
893	0.8700	0.8393	0.8910	0.9374	1.0830	0.8910
894	0.9996	0.7480	0.8910	0.9804	1.0830	0.9828
895	0.8400	0.7412	0.8910	0.9804	1.2255	0.9828
896	0.8904	0.6868	0.8910	0.9804	1.2255	0.9450
897	0.8904	0.7140	1.0593	0.9804	1.2255	0.9555
898	0.9156	0.8393	1.1700	0.9804	1.0028	1.0152
899	1.1186	0.9870	1.1700	0.9804	1.0028	0.9720
900	1.1730	0.9870	1.3068	1.1772	1.0830	1.0368
901	0.8700	0.8091	0.8910	0.9804	1.0260	0.9180
902	1.0812	1.0100	1.0593	1.2312	1.0260	1.0100
903	1.0200	0.8700	1.0593	0.9936	1.0260	0.9800
904	0.9222	0.8613	0.8910	1.1514	1.0830	1.0368
905	1.1872	1.0807	1.3068	1.0304	1.0830	1.1484
906	1.0304	1.1235	1.0593	1.1536	1.0260	1.0494
907	1.1200	1.0605	1.0593	1.1536	1.0260	1.0100
908	1.1316	1.1770	1.0593	1.1536	1.0260	0.9800
909	1.0304	1.0605	1.3068	1.0906	0.9936	1.0388
910	1.3038	1.0605	1.0593	1.0304	1.0260	0.9504

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PURE PREMIUM BAND

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911	1.2696	1.0605	1.5840	1.0906	1.0584	1.1368
912	1.0304	0.9999	1.3068	1.1536	1.0260	0.9408
913	1.2144	1.0605	1.4454	1.0906	1.0584	1.0494
914	1.0304	0.9870	1.3068	1.1536	0.9936	0.9408
915	1.0304	1.0605	1.3068	1.2236	0.9936	1.0100
916	1.0812	0.9494	1.0593	1.1536	1.0830	1.0100
917	1.0200	0.8787	1.0593	1.1124	1.0260	0.9306
918	1.0246	0.7777	1.0593	1.1772	1.0488	0.9180
919	1.1118	1.0100	0.8910	1.1124	1.0260	1.0100
920	0.9400	0.8085	1.0593	1.0403	1.2255	0.9792
921	0.8904	0.7140	0.8910	0.9374	1.0830	0.9191
922	0.7728	0.6510	0.8910	0.8858	1.0488	0.9282
923	0.9156	0.6732	0.8910	0.9804	1.0830	0.9180
924	0.9964	0.7140	1.0593	1.1009	1.0260	0.9009
925	0.9222	0.6732	1.0593	0.9292	1.0830	0.9009
926	1.0005	0.6732	1.0593	1.0403	1.0830	0.9090
927	0.9156	0.6732	0.8910	0.9374	1.0830	0.9450
928	0.8272	0.8787	1.0593	1.0403	1.0260	0.9212
929	0.8648	0.7777	1.0593	0.9292	1.0260	0.8820
930	1.3446	0.6262	0.8910	1.1009	1.0260	0.9191
931	0.8272	0.8085	1.0593	1.1009	1.1868	0.9720
932	0.9660	0.6262	0.8910	0.9374	1.0260	0.9282
933	0.8004	0.6732	1.0593	1.1009	1.0260	0.8613
934	0.8904	0.6510	0.8910	1.0403	1.0830	0.9282
935	1.0005	0.6800	1.0593	1.1772	0.9936	0.9720
936	0.8004	0.6732	1.0593	1.0403	1.0260	0.9191
937	0.8586	0.6820	0.8910	0.9374	1.0830	0.9282
938	0.8829	0.7140	0.8910	0.9804	1.0830	0.9191
939	1.3446	0.6138	0.8910	0.8858	0.9936	0.9135
940	0.8272	0.6868	1.0593	0.9292	1.0260	0.9212
941	1.0810	0.8085	1.3068	1.1772	1.0260	0.9212
942	0.9222	0.6868	1.0593	1.1009	1.0260	0.8820
943	0.9315	0.5704	0.8910	0.8858	1.0830	0.8910
944	0.8976	0.8085	1.3068	0.9936	1.0830	0.9504
945	0.9483	0.9135	0.8910	1.1009	1.2255	0.9696

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946	0.9483	0.6732	1.3910	1.1009	1.0260	0.8918
947	0.8904	0.6696	0.8910	1.1009	1.0830	0.9191
948	0.9639	0.6138	0.8910	1.1514	1.0260	0.9009
949	0.8829	0.6138	0.8910	0.9374	1.0830	0.8613
950	1.0246	0.7140	1.0593	1.1009	1.2255	0.9555
951	0.8829	0.6200	0.8910	0.9804	1.0260	0.9282
952	1.3446	0.6138	0.8910	0.9804	0.9936	0.8874
953	0.8829	0.6820	0.8910	0.9374	0.9936	0.9396
954	0.9996	0.6138	0.8910	1.1514	1.0488	0.9720
955	0.9222	0.7700	1.0593	1.1009	1.0355	0.8918
956	0.9660	0.7480	0.8910	0.8858	1.1556	0.9282
957	1.0005	0.6324	0.8910	1.1009	1.0260	0.8918
958	0.8400	0.6262	0.8910	1.1009	1.0260	0.8787
959	0.8100	0.6510	0.8910	0.8858	0.9936	0.9828
960	0.8586	0.6262	0.8910	0.9374	0.9936	0.9396
961	0.9315	0.6200	0.8910	0.9374	1.0584	0.9744
962	0.9639	0.6200	0.8910	0.8858	1.0584	0.9135
963	0.9660	0.6138	1.0890	0.9374	1.0830	0.9396
964	0.9639	0.6262	0.8910	0.9374	1.0028	0.9396
965	0.9315	0.6138	0.8910	0.9374	0.9936	0.9450
966	0.9639	0.5766	0.8910	0.8858	1.0260	0.8874
967	0.9315	0.5704	0.8910	0.9374	1.0260	0.8613
968	0.8829	0.6138	0.8910	0.9374	0.9936	0.9135
969	0.8100	0.5766	0.8910	0.9374	1.0488	0.8787
970	0.9639	0.6200	0.8910	0.9374	1.0260	0.8874
971	0.9156	0.5766	1.0890	0.9804	1.1342	0.9135
972	0.9315	0.6262	0.8910	0.9374	1.0070	0.9009
973	0.8829	0.6138	0.8910	0.9374	0.9936	0.8787
974	0.9315	0.5766	0.8910	0.9374	1.0355	0.8787
975	0.9315	0.6200	0.8910	0.8858	0.9936	0.9720
976	0.9639	0.6262	0.8910	0.9374	1.0830	0.8613
977	0.9639	0.6510	0.8910	0.9374	1.1556	0.9744
978	0.9315	0.6200	0.8910	0.8858	1.0028	0.9396
979	0.9315	0.5766	0.8910	0.8858	0.9936	0.9396
980	0.9315	0.6200	0.8910	0.8858	1.0260	0.8526

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

CIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
981	0.8829	0.5766	0.8910	0.9374	0.9936	0.9555
982	0.8829	0.5766	0.8910	0.9374	1.0488	0.8787
983	0.9315	0.5766	0.8910	0.8858	1.0584	0.8874
984	0.8829	0.6138	0.8910	0.9374	1.1556	0.9396
985	0.8829	0.6510	0.8910	0.9804	1.0260	0.8874
986	0.8904	0.8316	0.8910	0.9804	1.0260	0.9720
987	1.1988	0.6510	0.8910	0.9804	1.1556	0.9555
988	1.1988	0.6510	0.8910	0.9804	1.1556	0.9396
989	0.8829	0.6138	0.8910	0.8858	1.1556	0.9555
990	0.9639	0.5704	0.8910	0.9374	0.9936	0.9396
991	1.3446	0.6820	0.8910	0.9374	1.1556	0.9828
992	0.9639	0.6138	0.8910	0.8858	1.1172	0.9828
993	0.9639	0.6138	0.8910	0.7912	1.1172	0.9191
994	1.1988	0.6200	0.8910	0.9804	1.1556	0.9828
995	1.1988	0.6138	0.8910	0.9374	0.9936	0.8874
996	0.8829	0.8470	0.8910	0.9804	1.0260	0.9588
997	0.8829	0.8393	0.8910	0.9804	1.0260	0.9090
998	0.9483	0.9570	0.8910	0.9804	1.0028	0.9180
999	0.9639	0.8393	0.8910	0.9804	1.0355	0.9720

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
1	1.1088	0.9680	1.2870	1.1220	0.9718	1.0584
2	1.4880	0.9680	1.7690	1.1220	1.0170	1.1124
3	1.2848	1.5540	1.9520	1.2540	1.0750	1.4256
4	1.4892	1.5960	1.9520	1.3860	1.0750	1.4256
5	1.3640	1.5540	1.4355	1.2540	1.0750	1.2204
6	1.3640	1.3500	1.5860	1.2540	0.9632	1.1526
7	1.4892	1.5352	1.5840	1.3860	1.0750	1.6112
8	1.4880	1.0560	1.4355	1.2540	1.0320	1.1124
9	1.3640	1.5540	1.4355	1.1220	0.9804	1.3992
10	1.4892	1.5540	1.7690	1.1220	1.0080	1.6112
11	1.4880	1.4175	1.7690	1.2540	0.9632	1.3992
12	1.5810	1.4175	1.2870	1.2540	0.9804	1.1124
13	1.4892	1.6280	1.4355	1.2540	1.0260	1.3992
14	1.4880	1.1340	1.4355	1.2540	0.9632	1.1526
15	1.5810	1.5540	1.4355	1.3860	1.0750	1.2204
16	1.0458	1.0080	1.0296	0.9265	0.9632	0.9588
17	1.0584	0.9240	1.2870	1.1220	1.0320	0.9996
18	1.5370	1.4948	1.2688	1.1856	0.9804	1.3992
19	1.6240	1.4800	1.2870	1.1440	0.9546	1.1526
20	1.4880	1.4800	1.2870	1.3860	0.9804	1.1526
21	1.6352	1.4948	2.0960	1.3860	1.0080	1.4256
22	1.5810	1.5540	2.0960	1.3860	0.9632	1.2204
23	1.2180	1.0710	1.5860	1.1220	0.9632	0.9996
24	1.0458	1.0710	1.0296	0.9265	0.9632	0.9996
25	1.2760	1.0560	1.7030	1.2540	1.0320	1.0584
26	1.2760	1.3764	1.0296	0.9880	0.9546	1.1413
27	1.5810	1.3984	1.7030	1.1990	0.9804	1.3464
28	1.4016	1.1880	1.4355	1.2540	1.0320	1.2204
29	1.4880	1.5540	1.7690	1.4520	0.9632	1.2204
30	1.2760	1.0800	1.0296	1.1220	1.0750	1.0403
31	1.0458	0.9240	1.2870	1.1220	0.9632	1.0152
32	1.2760	1.1340	1.2870	1.1220	1.0750	1.1526
33	0.9492	1.0800	1.0296	0.9880	0.9546	0.9494
34	1.5810	1.5200	1.4355	1.5048	1.1250	1.3680
35	1.6240	1.4948	1.2870	1.2426	0.9804	1.2204

State: **CALIFORNIA**
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 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
36	1.3356	1.4800	1.0296	1.0944	0.9804	1.3068
37	1.2760	1.1340	1.0296	1.0355	1.0750	1.1124
38	1.2180	1.0200	1.2870	1.2540	1.0320	1.0506
39	1.3020	1.1118	1.5860	1.1220	1.0800	1.1124
40	1.2760	1.0080	1.2870	1.3860	1.0800	1.0584
41	1.1088	1.4175	1.0296	1.1440	0.9804	1.0584
42	1.2096	1.0800	1.0296	1.0920	0.9546	0.9898
43	1.6820	1.6280	1.0296	1.1856	0.9804	1.5029
44	1.6240	1.4800	1.2870	0.9265	1.1250	1.3992
45	1.5370	1.5540	1.2688	1.2426	1.0750	1.1978
46	1.4880	1.4800	1.2870	1.0355	1.1250	1.4256
47	0.9944	1.0800	0.8613	0.9880	0.9546	1.0388
48	1.0584	0.8690	1.0296	1.1220	0.9718	0.9936
49	2.0880	1.6280	1.2688	1.2426	0.9632	1.7556
50	1.7980	1.6720	1.2870	1.2426	1.0750	1.4916
51	1.1088	0.9240	1.2870	1.1220	1.0320	1.0584
52	1.0584	1.3635	1.0296	1.0920	0.9546	1.0403
53	1.0584	1.3635	1.0296	1.2540	0.9546	1.0197
54	1.1088	1.1340	1.0296	1.1220	0.9632	1.0584
55	1.1088	1.0710	1.2870	1.1220	0.9632	0.9996
56	1.0584	1.0710	1.0296	1.2540	1.0750	0.9588
57	1.0600	1.0800	0.8613	1.1440	0.9202	0.9108
58	1.0584	0.9600	1.2870	1.2540	0.9632	0.9996
59	0.9492	0.9600	1.0296	0.9265	0.9632	0.9494
60	0.8400	1.0800	0.8613	1.0080	0.8428	0.9898
61	0.9379	1.0800	1.0296	0.8840	1.0750	0.9494
62	1.0584	0.9592	1.7030	1.1220	1.0170	1.0584
63	1.3108	1.0800	0.8613	1.0944	1.1250	1.3034
64	0.9282	1.0200	0.8613	1.0560	1.0212	0.9270
65	1.2656	1.3500	0.8613	1.0944	0.9804	1.0918
66	1.0192	1.0800	0.8613	0.8800	0.9202	1.0388
67	1.0200	1.0908	0.8613	1.0944	0.9546	1.1124
68	0.9600	1.0044	0.8613	1.0080	0.9202	1.1187
69	1.2852	1.4175	1.0296	1.1440	0.9804	1.1124
70	1.2096	1.3635	1.0296	1.1440	1.0260	1.2204

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
71	0.8400	1.0200	1.0296	1.0080	0.9630	0.9588
72	1.2096	1.0560	1.0296	0.9265	1.0750	0.9588
73	1.2656	1.3635	1.0296	1.0920	0.9990	1.1124
74	1.2096	1.3635	1.0296	1.1440	0.9202	1.0403
75	1.0848	1.0908	1.2688	1.0355	0.9804	0.9306
76	0.9492	1.0302	1.2870	0.9265	0.9546	0.9588
77	0.8800	1.0044	1.0296	1.0920	0.9202	0.9306
78	0.9379	0.9600	1.0296	0.9265	0.9804	0.9588
79	0.9492	1.0710	1.0296	0.9265	0.9804	0.9588
80	0.8800	0.9600	0.8613	1.0920	0.9546	0.9384
81	1.0584	1.0800	1.2870	0.9265	0.9804	1.0584
82	1.1088	1.0908	1.2870	1.0355	0.9202	1.0152
83	1.0584	1.0908	1.2870	1.0355	0.9202	0.9494
84	0.9944	1.0302	1.0296	0.8840	0.9546	0.9588
85	0.9944	1.0302	1.0296	0.9265	0.9804	0.9588
86	0.9379	1.3500	0.8613	0.8840	0.9202	0.9898
87	1.0584	0.9600	1.0296	0.9265	1.0750	0.9494
88	1.1088	1.0908	1.2870	1.0355	0.9546	0.9898
89	0.9646	0.6200	0.8613	1.0920	0.9202	0.8585
90	0.9492	1.0200	1.2870	0.9265	0.9546	0.9702
91	0.9492	0.9696	0.8613	0.9265	0.9546	0.9384
92	0.8400	1.0302	0.8613	0.8840	0.9202	0.8888
93	0.8400	1.0200	0.8613	0.9120	0.9202	0.8712
94	1.2096	1.0800	1.0296	0.9265	1.0260	1.0403
95	0.8800	1.1340	0.8613	0.9880	0.9630	0.9898
96	0.8800	0.9936	0.8613	1.0560	0.8428	0.9212
97	0.9600	0.9486	0.8613	1.0560	0.8820	1.0152
98	1.0848	0.9240	1.0296	0.9265	1.0750	0.9494
99	0.8800	0.9696	1.0296	0.9880	0.9202	0.9292
100	1.3920	1.3500	1.0296	0.9265	0.9990	1.0506
101	0.8008	0.9384	0.8613	1.0080	0.8820	1.0197
102	0.9379	1.0710	1.2870	0.9265	1.0260	1.0197
103	0.8400	1.0302	0.8613	0.9880	0.9202	0.9494
104	0.9600	1.0302	0.8613	0.9120	0.9202	0.9108
105	0.9944	1.0908	1.0296	0.9880	0.9202	0.9494

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
106	0.9600	0.9486	0.8613	0.8160	0.8428	0.9292
107	1.2760	1.0800	1.0296	0.9265	0.9804	0.9996
108	1.1088	1.0800	1.0296	0.9880	0.9546	1.0584
109	0.8800	0.9384	1.0296	0.9265	0.9804	1.0396
110	1.2656	1.1340	1.0296	0.9880	0.9804	1.1074
111	1.5370	1.3635	1.7690	1.4520	0.9804	1.0506
112	1.2096	1.3500	1.0296	1.0355	0.9202	1.0584
113	1.6820	1.1340	1.8995	1.3860	0.9632	1.0388
114	1.4790	1.4175	1.7690	1.4520	1.0320	1.0918
115	1.1088	1.3500	1.0296	1.1445	0.9630	1.1124
116	1.1600	1.0800	0.8613	0.9880	0.9990	1.0584
117	1.4112	1.1340	1.0296	1.1445	1.0260	1.0584
118	1.1600	1.0800	1.5860	1.0355	1.0260	1.0584
119	1.6352	1.4715	2.0960	1.4520	0.9718	1.2769
120	1.4790	1.4175	1.7690	1.4520	0.9632	1.1124
121	1.5476	1.6280	1.9520	1.4520	1.0800	1.3992
122	1.4880	1.4175	2.0960	1.2540	1.0320	1.1978
123	1.3920	1.4175	1.2870	1.3860	0.9546	1.1124
124	1.1200	0.9486	0.8613	1.0944	0.9202	0.9936
125	1.3356	1.4715	1.0296	1.1856	0.9804	1.1639
126	1.4790	1.4850	1.2870	1.2540	1.0750	1.1124
127	1.5810	1.4175	1.2870	1.5048	0.9804	1.1124
128	1.6240	1.4175	1.2870	1.1990	0.9804	1.0584
129	1.7360	1.6280	1.5860	1.5048	1.0750	1.1978
130	0.9646	0.9600	0.8613	1.0944	0.8428	0.9588
131	1.0848	1.1340	1.0296	1.1445	0.9546	0.9936
132	1.3020	1.6280	1.2870	1.4520	1.0750	1.1526
133	1.3920	1.0464	1.2870	1.3860	1.0320	1.0584
134	1.5810	1.4850	1.7690	1.4520	1.0750	1.1124
135	1.3356	1.0560	1.0296	1.3860	0.9632	1.0152
136	1.4790	1.0710	1.2870	1.3860	0.9632	1.0584
137	1.4112	1.1220	1.2870	1.2540	0.9804	1.1124
138	1.0848	1.1340	1.0296	1.1440	0.8820	0.9936
139	1.5810	1.1772	1.8995	1.3860	1.0320	1.1124
140	0.8800	0.9696	1.0296	1.0920	0.8428	0.9936

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
141	1.0200	1.0200	0.8613	1.0560	0.8428	0.9384
142	1.1200	1.0080	1.0296	1.0560	0.8820	0.9936
143	1.6820	1.3500	1.2870	1.2426	1.0750	1.0918
144	1.2656	1.1880	1.0296	1.0944	0.9630	1.0152
145	1.2656	1.1340	1.2870	1.1990	0.9630	0.9964
146	0.9282	1.0080	0.8613	1.0560	0.9630	0.9504
147	1.4112	1.1880	1.2870	1.1445	1.0260	1.0584
148	1.7360	1.6280	2.0960	1.4520	1.0320	1.1978
149	1.2760	1.4800	1.2870	1.1990	1.1250	1.1978
150	1.6352	1.4715	2.0960	1.2540	0.9718	1.3992
151	1.2852	1.3500	1.0296	1.1990	1.0750	0.9898
152	0.8800	0.9600	0.8613	0.9880	0.9630	0.9936
153	1.0200	0.9696	0.8613	0.9880	0.9844	1.0584
154	0.8008	0.8800	0.8613	0.9120	0.8820	0.9504
155	1.0848	0.9600	0.8613	0.8840	0.9804	0.9384
156	0.9944	1.0302	1.0296	0.8840	0.9630	0.9588
157	1.0584	1.0080	1.2870	0.9265	0.9632	1.0152
158	0.8400	0.9600	0.8613	1.0920	0.9630	0.9936
159	0.8300	1.0302	0.8613	0.9120	0.9202	0.9936
160	0.8800	0.9696	0.8613	1.0080	0.9202	0.9384
161	0.8300	0.8800	1.0296	0.9265	1.0260	0.9384
162	1.2180	1.0908	1.4355	1.1220	0.9804	0.9996
163	0.8800	0.8888	0.8613	0.9880	0.9990	0.9936
164	0.9379	1.0080	1.2870	0.9265	0.9804	0.9494
165	0.9492	0.9240	1.2870	1.1220	1.1250	0.9588
166	1.0848	1.0302	1.2870	1.0355	0.9202	1.0152
167	0.9379	0.9240	1.0296	0.9265	1.1250	1.0152
168	0.9492	1.0080	1.0296	1.1445	1.0260	0.9588
169	0.8800	0.9696	0.8613	1.0560	0.8820	0.9936
170	1.2180	1.3500	1.4355	1.1220	0.9546	1.0197
171	1.2760	1.3635	1.4355	1.1220	0.9546	0.9702
172	0.7968	0.7979	0.8613	1.0944	0.9009	0.9612
173	0.8008	0.8832	0.8613	0.9120	1.0593	0.9494
174	0.7950	0.6200	0.8613	0.7600	1.0593	0.9434
175	0.9628	0.6900	0.8613	1.0560	1.0593	0.9944

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
176	0.7644	0.9384	0.8613	0.9880	1.2654	0.9270
177	0.7553	0.9936	1.0296	0.9880	1.2375	1.0170
178	0.8008	0.9486	0.8613	0.9880	1.1844	0.9270
179	0.8008	0.8184	1.0296	1.0560	1.0094	0.9292
180	0.8736	0.8928	0.8613	1.0080	1.2348	0.9270
181	0.8466	0.7245	0.8613	0.9120	0.9702	0.9180
182	0.6972	0.7900	0.8613	1.0920	1.1536	0.9944
183	0.8400	0.9486	0.8613	0.8840	1.1742	0.9306
184	0.8466	0.6200	0.8613	1.0560	1.0488	0.9434
185	0.9628	0.8800	0.8613	1.0560	1.0989	0.9328
186	0.6972	0.8832	0.8613	1.0560	0.8372	0.9212
187	0.7304	0.9936	0.8613	0.8400	0.8372	0.9604
188	0.8300	0.9384	1.0296	0.9880	1.0593	0.9306
189	0.8300	0.9486	1.0296	0.9265	1.2375	0.9702
190	0.8960	0.6900	0.8613	0.8800	0.9702	0.9078
191	0.9628	0.6417	0.8613	1.0080	1.1286	1.0057
192	0.8300	0.9486	0.8613	0.8840	1.0593	1.1187
193	1.0200	1.0800	0.8613	0.9120	1.0094	0.9494
194	0.7968	0.5766	0.8613	0.9120	1.2375	1.0057
195	0.9282	0.9240	0.8613	1.0944	0.8372	0.9504
196	0.8160	0.6262	0.8613	1.0080	1.0212	0.9180
197	0.8798	1.0302	0.8613	0.9120	0.9306	0.8888
198	0.7968	1.0044	0.8613	1.0944	0.8648	0.9306
199	0.9646	1.0044	0.8613	0.9120	0.9964	0.8820
200	0.7968	0.9600	0.8613	0.8400	0.8648	0.8712
201	0.8466	0.9600	0.8613	0.9120	0.9306	0.9588
202	0.8798	1.0302	0.8613	0.9120	0.8372	1.0152
203	0.8800	0.9384	0.8613	1.0560	1.0593	0.9702
204	0.8400	0.8832	0.8613	1.0080	0.9016	1.0197
205	0.9296	0.8928	0.8613	0.9120	0.9373	0.8460
206	0.8736	1.0200	1.0296	1.1440	0.8372	1.0403
207	0.9282	0.9486	0.8613	1.0560	1.0388	0.9270
208	0.7644	0.8928	0.8613	1.0944	0.9016	0.9936
209	0.8160	0.6969	0.8613	0.9120	1.0593	1.0057
210	0.9296	1.0044	0.8613	0.9120	0.9009	0.9270

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
211	0.8800	1.4800	0.8613	1.0944	0.9555	1.3992
212	1.5810	1.6720	0.8613	1.0560	1.1342	2.0216
213	0.8736	1.0044	0.8613	1.0080	0.9555	0.9270
214	0.8800	1.0200	1.0296	1.1856	0.9870	0.9270
215	0.8008	1.0800	1.0296	1.1440	0.9870	1.0094
216	1.0200	1.0710	0.8613	1.0920	0.9016	1.2236
217	0.9296	0.8295	0.8613	1.0560	1.0593	0.9936
218	0.7968	1.0200	0.8613	0.8800	1.0094	0.8280
219	0.8798	0.9696	0.8613	0.9120	1.0593	1.0152
220	0.8466	0.7245	0.8613	1.0560	0.9702	0.9010
221	1.1520	0.9240	0.8613	0.9120	0.9844	1.1704
222	0.7644	0.9600	1.0296	1.0080	0.8372	0.9898
223	0.9282	0.8611	0.8613	1.0944	1.0593	0.9328
224	0.8008	1.0044	0.8613	1.0080	0.9555	0.8820
225	0.8466	0.9384	0.8613	0.9120	0.8372	0.8888
226	0.7304	0.9384	0.8613	1.0560	0.9870	0.8820
227	0.8008	0.9384	0.8613	1.0080	0.8190	0.9588
228	0.8400	1.0302	1.0296	1.0920	0.8190	0.9494
229	0.9296	1.1220	0.8613	0.9120	0.9844	1.1704
230	0.8008	0.9486	0.8613	1.0560	1.0101	1.0170
231	0.8736	0.9384	0.8613	1.0560	0.9646	0.9270
232	0.8800	1.2555	1.0296	0.9120	0.9016	1.0170
233	1.0458	1.2420	1.7690	1.3860	1.0989	1.0094
234	0.8466	0.9936	0.8613	0.8800	0.9555	0.9270
235	0.8736	1.0044	0.8613	0.8400	0.9016	0.8820
236	0.9600	0.9486	0.8613	1.0560	1.1342	1.0170
237	0.8008	1.0800	0.8613	0.8800	1.0290	1.0170
238	0.7304	0.9384	0.8613	0.7600	0.8372	0.9604
239	0.8008	1.0044	0.8613	1.0080	1.0290	0.9270
240	0.9492	0.9384	1.0296	0.9880	0.9844	0.9306
241	0.9492	1.2555	1.0296	1.1440	0.9702	1.0170
242	0.8008	0.9936	0.8613	1.0080	0.9702	0.9270
243	0.7304	0.9936	0.8613	0.9120	1.0388	0.8820
244	0.8960	1.0044	0.8613	0.6800	1.1844	0.8820
245	0.7968	0.8928	0.8613	0.8800	0.9555	0.9604

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
246	0.9296	0.9486	0.8613	0.7600	0.9016	0.9212
247	0.8736	0.8928	0.8613	1.0560	1.0388	0.8820
248	0.8736	1.0044	0.8613	1.0944	1.1466	0.9270
249	0.7304	1.0044	0.8613	0.8800	1.1844	0.9270
250	0.8736	1.0800	1.0296	1.0560	0.9555	0.9270
251	0.9296	0.9384	0.8613	0.9120	0.9555	0.8820
252	0.7968	0.9384	0.8613	0.8400	0.9555	0.8820
253	0.8736	0.9384	0.8613	0.8800	1.0434	0.8460
254	0.7968	1.0800	0.8613	0.8400	0.9870	0.9604
255	0.7968	1.0200	0.8613	0.8800	0.9870	0.8460
256	1.0200	1.3500	0.8613	1.0920	1.0388	1.1413
257	1.2180	1.6720	0.8613	0.6800	0.9870	1.2204
258	1.2760	1.5352	1.0296	0.8840	1.1844	1.6112
259	1.1200	1.6280	0.8613	0.7600	1.0094	1.1526
260	1.2852	1.5960	0.8613	0.8400	1.1342	1.7176
261	0.7553	0.9936	0.8613	0.8840	1.2875	0.9270
262	0.9282	1.4800	0.8613	0.8160	1.0434	1.2204
263	0.6889	0.6417	1.0296	0.8840	1.1639	0.9292
264	0.7304	0.8295	0.8613	0.9880	1.3250	0.9936
265	0.8466	0.7979	0.8613	1.0560	1.1766	0.8976
266	0.8480	0.7347	0.8613	0.9120	1.0593	0.9504
267	0.8480	0.8096	0.8613	0.9120	1.0094	0.9108
268	0.7304	0.7347	0.8613	1.0080	0.8820	0.9292
269	0.8008	0.7900	0.8613	0.9880	0.9844	0.9504
270	0.8400	0.6262	0.8613	0.9120	0.9844	0.8585
271	0.7680	0.6200	0.8613	1.0080	1.1500	0.9078
272	0.8798	0.6969	0.8613	0.9120	1.0593	0.9078
273	0.7200	0.6510	0.8613	0.8160	1.0396	0.9434
274	0.8466	0.7979	0.8613	0.9120	1.3250	0.9504
275	0.7304	0.8295	0.8613	1.0920	1.1433	0.9936
276	0.7968	0.7245	1.0296	0.9880	1.3320	0.9936
277	0.9296	0.6969	0.8613	1.0920	1.1766	0.9078
278	0.9282	0.9240	1.0296	1.1440	1.3125	0.9936
279	0.8160	0.7245	0.8613	1.0560	0.9844	0.9612
280	0.7680	0.6900	0.8613	0.8160	1.0304	0.9504

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
281	0.6300	0.6200	0.8613	0.8160	1.0304	0.9010
282	0.9280	0.6510	0.8613	0.9120	1.1500	0.9612
283	0.9296	0.7245	0.8613	0.9880	1.1342	0.9078
284	0.9296	0.7268	0.8613	1.0080	1.1433	0.9504
285	0.7304	0.6820	0.8613	1.1856	1.2432	0.9936
286	0.8736	0.6262	1.0296	0.9120	1.2875	0.9434
287	0.6720	0.6510	0.8613	1.0080	1.2375	0.9612
288	0.8798	0.8800	0.8613	0.9120	1.0593	0.9384
289	0.9646	0.9240	1.2688	1.1856	1.1286	0.9964
290	0.9280	0.8888	0.8613	0.8800	1.0593	0.9292
291	0.8400	0.5766	0.8613	0.9120	0.9844	0.9180
292	0.8798	0.6969	0.8613	1.0944	1.0593	0.9434
293	0.7968	0.6510	0.8613	0.9120	1.1872	0.9328
294	0.8798	0.8295	0.8613	1.0944	1.1766	0.8888
295	1.0556	0.9600	0.8613	1.0080	1.0101	1.0197
296	1.1978	1.6280	0.8613	0.8160	1.1235	2.0216
297	0.7304	0.6262	0.8613	0.9880	1.0488	0.9078
298	0.7040	0.6510	0.8613	0.8160	1.1500	0.9180
299	0.8800	1.1220	0.8613	0.8160	1.0304	1.0584
300	0.7680	0.7245	0.8613	0.8800	1.0388	0.9078
301	0.9492	0.9240	1.0296	1.2540	1.0260	1.0152
302	1.0600	1.1340	0.8613	1.0560	1.0290	1.1978
303	1.0192	0.9680	0.8613	0.9880	0.9844	0.9752
304	1.0192	0.8295	0.8613	1.0920	0.9630	0.9612
305	1.1200	0.8800	0.8613	0.9880	0.9630	0.8976
306	0.8480	0.8184	0.8613	0.9120	1.1844	0.8820
307	0.9282	0.6969	1.0296	0.9880	1.0290	0.9384
308	0.8008	0.9696	0.8613	0.8840	0.9630	0.8976
309	0.7040	0.8800	0.8613	0.7600	0.9016	0.8976
310	0.8160	0.8888	0.8613	1.0080	0.8820	0.9504
311	0.9944	0.8690	1.0296	1.1220	1.1250	0.9936
312	0.8400	0.9600	0.8613	1.1445	1.0488	0.9936
313	0.8800	0.9600	0.8613	0.9880	0.8820	0.9494
314	0.6972	0.8800	0.8613	1.0080	0.8820	0.8888
315	0.9492	0.8800	1.0296	0.9265	1.0260	1.0152

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
316	0.8008	0.9600	0.8613	0.9265	0.9844	0.9588
317	0.8480	0.6200	0.8613	0.9120	1.0593	0.8670
318	1.0556	0.8888	0.8613	1.0080	0.9555	0.9898
319	0.8800	0.9240	1.0296	0.9265	1.0260	0.9936
320	0.9628	0.9592	0.8613	0.9880	1.0388	1.1074
321	0.8008	0.8928	0.8613	0.9120	0.9844	1.0152
322	0.7968	0.9680	0.8613	1.0920	0.9844	0.9328
323	1.0192	0.7979	0.8613	1.1990	0.9555	0.8888
324	1.0200	0.9680	1.0296	1.2426	1.0989	0.9328
325	0.8800	0.9240	1.0296	1.0355	1.0212	0.9936
326	0.8798	0.7245	0.8613	0.9120	1.0094	0.9612
327	0.8466	0.8800	0.8613	1.0920	1.0212	0.9752
328	1.0192	0.9600	0.8613	0.9880	0.8820	0.9384
329	1.0556	0.7590	1.0296	0.9880	1.0989	0.9612
330	0.8798	0.6262	0.8613	1.0080	0.9009	0.8670
331	1.3120	0.6417	0.8613	0.6800	1.0593	0.9612
332	0.9628	0.6262	1.0296	0.8160	1.0290	0.9180
333	1.1200	0.7979	1.0296	1.0920	0.9702	0.9612
334	1.0192	0.7590	1.0296	1.0920	0.9844	0.8976
335	0.8736	1.0080	0.8613	1.1440	0.9844	0.9936
336	0.9280	0.6820	0.8613	1.0080	0.9844	0.8585
337	0.8798	0.8888	0.8613	0.9880	0.9016	0.9328
338	1.0800	0.6262	0.8613	0.9120	0.9844	0.8415
339	0.9492	1.0080	1.0296	1.0920	0.9630	0.9936
340	1.2096	0.9240	1.2870	1.5048	1.1286	1.0152
341	0.9944	0.8800	1.0296	0.9265	0.9990	0.9588
342	1.0192	0.7900	0.8613	1.1440	0.9702	0.9434
343	0.9944	0.9240	1.0296	1.0355	1.0260	0.9936
344	1.0848	0.9240	1.0296	1.0355	0.9804	1.0152
345	0.9379	1.0302	1.0296	1.0355	0.9546	0.9588
346	0.8800	1.0080	1.0296	0.9265	0.9546	0.9936
347	0.9492	0.9600	1.0296	0.9265	0.9546	0.9588
348	0.8008	0.7268	0.8613	0.9880	0.8820	0.9292
349	0.7644	0.8295	0.8613	1.0080	0.9702	0.9434
350	0.8466	0.7245	0.8613	1.0560	0.9844	0.9944

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
351	0.9600	0.9696	1.0296	1.0355	0.9844	0.9292
352	0.8800	0.8295	1.0296	0.8840	1.0260	0.8976
353	0.8798	0.6900	0.8613	0.8840	1.0593	0.9504
354	0.8800	1.0800	0.8613	1.0560	1.0290	0.9702
355	0.8800	1.0200	1.0296	1.0080	1.0101	1.0094
356	0.8736	0.8295	1.0296	1.1445	0.9990	0.9504
357	1.0600	0.8800	1.0296	1.1445	0.9990	0.9504
358	1.1526	1.0080	1.0296	1.0920	0.9702	1.1124
359	0.9646	0.8928	1.0296	1.1440	0.8190	0.8888
360	0.8800	0.9600	0.8613	1.0080	0.9016	0.9504
361	0.8400	0.9384	0.8613	1.1440	0.9009	0.9898
362	1.0200	0.9486	0.8613	1.0080	1.0434	0.8820
363	0.9282	0.8800	1.0296	1.0080	0.8372	0.8976
364	1.1200	0.9600	1.0296	1.1440	0.9009	0.9384
365	0.8400	1.0044	1.2870	1.0080	0.8820	0.9588
366	0.8008	1.0200	0.8613	0.8800	0.8190	0.9752
367	0.8400	1.0200	1.0296	0.9880	0.7826	0.9292
368	0.9282	1.0302	0.8613	0.8800	0.8460	0.9504
369	1.0848	1.3500	1.0296	1.1440	0.8820	1.0584
370	0.8800	1.0200	1.0296	0.9120	0.7826	0.9588
371	0.8800	0.9936	1.0296	1.0560	0.8190	0.9494
372	0.8160	0.9600	0.8613	0.8800	0.8190	0.8888
373	0.8008	0.9486	0.8613	0.8800	0.9630	0.9752
374	0.8800	1.0800	1.0296	1.0560	0.9202	0.9292
375	1.3612	1.2420	0.8613	0.9120	0.9202	0.8460
376	0.9600	0.9600	1.0296	1.0944	0.8428	0.9494
377	1.1526	1.0200	1.0296	1.0920	0.9202	0.9292
378	0.9282	1.0302	0.8613	1.0560	0.8820	0.9588
379	1.0200	1.0302	0.8613	1.0560	0.9202	0.9384
380	0.8008	0.9384	0.8613	1.0944	0.8190	0.8976
381	0.8736	0.9384	0.8613	0.8800	0.8190	0.9588
382	1.0192	1.0710	0.8613	0.8800	0.9630	1.2502
383	0.8736	1.0200	0.8613	1.0944	0.9630	1.0388
384	0.8800	1.0800	0.8613	1.0560	0.9630	0.9752
385	0.7553	0.9384	0.8613	0.9120	0.9202	0.9384

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
386	0.7968	0.9696	0.8613	0.8800	0.9009	0.8460
387	0.7968	0.9486	0.8613	0.8800	0.8820	0.9504
388	0.8400	1.0080	0.8613	1.0920	1.0212	0.9434
389	0.9282	1.0044	0.8613	1.0944	0.9009	0.8460
390	1.2180	1.0302	1.4355	1.2540	0.9546	0.9306
391	0.7304	0.9600	0.8613	0.8800	0.8190	0.9306
392	1.0200	0.9486	0.8613	1.0920	0.9202	1.0152
393	0.8300	1.0200	1.0296	1.0080	0.8820	0.9936
394	1.2180	1.0908	1.2870	1.2540	0.9804	0.9898
395	0.8300	0.9600	0.8613	0.9880	0.8428	0.8888
396	0.8008	0.8800	0.8613	1.0080	0.8428	0.9612
397	0.8400	1.0302	1.0296	0.8840	0.8372	0.9384
398	0.8800	0.9696	1.0296	1.0920	0.9646	0.9936
399	0.8400	1.0302	0.8613	1.0560	0.8820	0.9936
400	0.8736	0.9600	0.8613	1.0080	0.8190	0.8712
401	1.0192	0.8832	0.8613	1.0080	0.8428	0.9702
402	0.9296	0.9600	0.8613	0.8400	0.8190	0.9108
403	0.8736	0.9696	0.8613	1.0944	0.7826	1.0152
404	0.8960	0.8888	0.8613	0.8400	0.8190	0.8989
405	1.0600	1.0080	0.8613	1.0944	0.8820	0.9504
406	0.8160	0.7979	0.8613	0.8400	0.8190	0.9078
407	0.8800	0.9240	1.2688	0.9265	1.0260	0.9494
408	0.8736	0.9240	1.0296	1.0920	0.8820	0.9108
409	0.9646	0.8295	1.0296	1.0080	0.9990	0.9504
410	0.9600	0.9600	1.0296	1.1445	0.8372	1.0403
411	1.1600	1.0302	1.0296	0.9880	0.9016	1.1124
412	0.6972	0.6900	0.8613	0.9120	0.9630	0.8670
413	0.9646	0.9240	0.8613	1.0080	0.8820	0.9434
414	0.7304	1.0200	0.8613	0.8800	0.8372	0.9306
415	0.8736	1.0200	0.8613	0.8400	0.9844	0.9306
416	0.8798	0.9486	0.8613	0.9120	0.8820	0.9108
417	0.8800	1.1880	1.0296	1.0080	0.9844	1.0584
418	0.8798	1.0080	1.0614	0.9120	0.9630	0.9936
419	0.7040	0.8800	0.8613	0.8400	0.8190	0.8712
420	0.8466	0.6900	1.0296	0.9880	0.9844	0.8888

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
421	1.0192	0.7521	1.7030	1.1856	1.1040	0.9936
422	0.8160	0.6510	0.8613	0.8160	1.0212	0.9078
423	0.7304	0.6900	1.0296	1.0920	0.9990	0.9504
424	0.8466	0.6820	0.8613	0.9120	1.0488	0.9328
425	0.6972	0.6758	1.0296	0.8840	1.2375	0.9504
426	0.7950	0.6262	0.8613	0.8800	1.0094	0.9078
427	0.6972	0.6510	1.0296	0.9880	0.9844	0.9180
428	0.7304	0.7590	1.0296	0.8840	1.1880	0.9384
429	0.7040	0.6820	1.0296	0.8840	1.1639	0.9328
430	0.8400	0.8690	1.2870	0.8840	1.0212	0.8976
431	0.8160	0.6969	0.8613	0.8800	1.0094	0.9612
432	1.0556	0.7245	0.8613	1.1440	0.9844	0.9504
433	1.0556	0.9680	1.0614	0.9880	0.9990	0.9504
434	0.7968	0.6510	1.0296	0.8840	1.0212	0.9078
435	0.8160	0.5766	0.8613	1.0944	1.0212	0.9010
436	1.3120	0.6200	0.8613	1.0560	0.9990	0.9180
437	0.8800	0.7590	1.2870	1.0355	1.1040	0.9588
438	0.8466	0.7245	0.8613	0.9120	0.9844	0.8989
439	1.0200	0.8295	1.0296	1.1440	0.9990	0.9434
440	0.7680	0.6900	0.8613	0.8840	0.9844	0.8670
441	0.8798	0.7347	0.8613	1.0080	1.0388	0.9016
442	0.7040	0.6758	1.0296	0.8800	1.1040	0.9612
443	0.9296	0.6758	1.0296	0.8840	1.2375	0.9504
444	0.8400	0.6262	0.8613	1.0560	1.0593	0.9180
445	0.9282	0.7245	0.8613	1.0080	0.9844	0.9612
446	0.6225	0.6200	0.8613	0.8800	0.9702	0.9612
447	1.3120	0.6200	0.8613	1.0080	0.9844	0.8670
448	0.8008	0.6969	1.0296	0.9880	1.0989	0.8888
449	0.7644	0.6820	1.0296	0.9880	1.0488	0.9504
450	0.6720	0.6758	0.8613	0.7600	0.9844	0.9612
451	1.0556	0.8690	1.3624	1.0920	1.0304	0.9504
452	0.6972	0.6510	0.8613	1.0080	0.9702	0.9180
453	0.8466	0.6758	1.2688	0.8840	0.9016	0.8976
454	0.8736	0.7590	1.0296	0.9880	1.0488	0.9384
455	0.7680	0.6820	0.8613	0.8160	0.9702	0.9180

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
456	0.8008	0.6820	1.0296	0.9120	1.1286	0.8989
457	0.7644	0.7245	1.0296	0.9880	1.1286	0.8976
458	0.8008	0.8800	1.0296	1.0080	0.8372	0.8712
459	0.8798	0.6262	0.8613	1.0080	0.9990	0.9180
460	1.3104	0.8295	1.2688	0.9120	1.1500	0.9078
461	0.8800	0.7900	1.0296	0.8840	0.9844	0.9504
462	0.9600	1.0200	1.0296	0.8840	1.0488	0.9494
463	0.8736	0.8800	1.0614	0.9880	1.0212	0.8976
464	1.0600	0.8800	1.0296	1.1856	0.9990	1.0152
465	0.8736	1.0080	1.0614	1.0080	1.0488	0.8976
466	0.8736	0.9680	1.1397	1.1440	0.9990	0.9504
467	0.7040	0.7900	0.8613	0.9120	0.8372	0.8811
468	0.7304	0.9600	0.8613	0.9120	0.8372	0.8888
469	0.8960	0.7900	0.8613	0.7600	0.8372	0.9078
470	0.7200	0.7245	0.8613	0.9120	0.9009	0.9078
471	0.8160	0.6820	0.8613	0.8800	1.0593	0.9010
472	0.7040	0.6900	0.8613	0.8400	0.9306	0.8670
473	0.8400	0.6417	0.8613	0.9120	0.9702	0.8415
474	0.7304	0.7521	0.8613	0.8160	0.8372	0.8976
475	0.7950	0.8295	0.8613	0.9120	0.8372	0.8670
476	0.6600	0.6510	1.0614	0.9120	1.0593	0.9010
477	1.3120	0.8295	0.8613	0.8800	0.8372	0.8989
478	0.6972	0.7245	1.0296	0.8840	0.9016	0.9936
479	0.7950	0.7245	0.8613	0.9120	0.9016	0.9180
480	0.7040	0.7347	0.8613	0.8400	0.9702	0.9108
481	0.8960	0.6900	0.8613	0.7600	0.9870	0.8888
482	0.7680	0.6417	0.8613	0.9120	0.9016	0.9612
483	0.8960	0.7979	0.8613	0.9120	0.9016	0.8585
484	0.6720	0.6900	0.8613	0.6800	0.9306	0.9078
485	0.7040	0.8295	0.8613	0.9120	0.9702	0.9612
486	0.7040	0.7245	0.8613	0.9120	1.0593	0.8585
487	0.6720	0.7245	0.8613	0.9120	1.1021	0.9434
488	0.6972	0.8295	0.8613	0.8160	0.9016	0.9108
489	0.6972	0.7900	0.8613	1.0080	0.8372	0.8888
490	0.6889	0.7245	1.0296	0.8840	1.0593	0.9108

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
491	0.8960	0.8295	0.8613	0.8400	0.9016	0.9612
492	0.8480	0.6900	0.8613	0.8400	0.8372	0.8670
493	0.7650	0.6510	0.8613	1.0080	1.0094	0.8585
494	0.8400	0.5704	0.8613	1.0560	0.9016	0.8585
495	0.7950	0.5766	0.8613	0.7600	1.0593	0.8585
496	1.3120	0.6262	0.8613	1.2426	0.9702	0.8670
497	1.0800	0.6262	0.8613	0.9120	1.0388	0.9434
498	1.3120	0.6510	0.8613	1.0560	0.9844	0.8670
499	0.9296	0.6200	1.0614	1.1856	0.9555	0.8585
500	1.2300	0.6200	0.8613	1.0080	1.0593	0.9180
501	1.6400	0.7521	1.0296	1.1990	0.9990	0.9434
502	1.2852	1.0080	1.2870	1.4520	0.9990	0.9936
503	0.8700	0.5704	0.8613	0.9120	1.0388	0.9180
504	1.2852	0.8611	1.2870	1.4520	0.9804	0.9328
505	1.1600	0.6900	1.0296	1.1445	0.9990	0.9612
506	0.8480	0.6510	0.8613	1.0080	0.9844	0.9180
507	0.8400	0.8295	0.8613	0.8800	1.0388	0.8976
508	1.4790	1.0560	1.2870	1.4520	1.1250	1.0152
509	1.3108	0.9240	1.0296	1.1990	0.9546	1.0057
510	1.2300	0.6262	0.8613	1.0560	1.0593	0.8989
511	0.8160	0.6900	0.8613	0.8800	0.9373	0.9078
512	0.8466	0.7590	1.0296	1.0944	0.9373	0.9328
513	0.8480	0.6417	0.8613	1.0560	1.0094	0.9010
514	1.3612	0.6510	1.0296	0.9265	1.1286	0.9612
515	1.0192	0.7245	1.2870	0.9265	1.0488	0.9078
516	0.8008	0.7590	1.0296	0.8840	1.1021	0.9504
517	1.0200	0.9240	1.0296	0.9880	0.8372	0.8712
518	1.0848	0.9600	1.2870	0.9265	0.9844	0.9016
519	0.8480	0.6900	1.0614	0.9120	0.9646	0.9612
520	0.7644	0.7245	1.0296	1.0355	1.1500	0.8976
521	1.0192	0.8295	1.0296	1.0560	0.9009	0.9078
522	0.8160	0.6510	1.0296	0.8840	1.0593	0.9078
523	0.7680	0.6200	0.8613	0.6800	0.9646	0.8585
524	1.0600	0.7245	1.2870	1.1220	1.0989	0.9936
525	1.0556	0.8800	1.0296	1.0560	0.9702	1.1837

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
526	0.7680	0.6510	0.8613	0.9120	0.9844	0.9434
527	0.9646	0.8611	1.0296	0.9880	0.9702	0.9612
528	0.8008	0.7245	1.0296	0.8160	1.0094	0.8989
529	0.8008	0.8295	1.0296	0.9265	1.0989	0.9292
530	0.9296	0.6820	1.2870	0.9880	1.2375	0.8976
531	0.9628	0.6820	0.8613	1.0560	1.1342	1.0057
532	0.9282	0.8295	0.8613	0.9120	0.9373	0.9612
533	0.9282	0.6820	1.2870	1.1445	1.2375	0.9504
534	0.8800	0.7590	1.2870	1.1445	1.1500	0.9328
535	0.8466	0.7245	1.0296	1.0080	0.9306	0.9434
536	0.8400	0.7245	1.4355	1.1220	1.1500	0.9384
537	1.0600	0.8690	1.2870	1.0355	1.1286	0.9292
538	0.7650	0.6200	0.8613	0.8800	1.0388	0.9180
539	1.2035	0.9240	1.5840	1.1220	1.1742	1.0197
540	1.0584	0.8888	1.4355	1.1220	1.0488	0.9212
541	0.8400	0.9696	1.2870	1.1445	0.9016	0.9016
542	1.0584	0.9600	1.4355	1.0355	1.0212	0.9306
543	0.9944	0.7900	1.7690	1.1220	1.2375	0.9306
544	0.8400	0.8888	1.2870	0.8840	0.9702	0.9016
545	1.2760	1.0710	1.5840	1.1220	1.1286	0.9996
546	1.0848	0.9600	1.4355	1.2540	1.0989	0.9494
547	0.9492	0.7979	1.4355	1.1220	1.0593	0.9108
548	0.9944	0.8800	1.2870	1.1220	1.0212	0.9212
549	0.6972	0.9240	1.0296	0.8160	1.0094	0.9212
550	0.7644	0.8690	1.2870	0.8840	1.1760	1.1187
551	0.7304	0.9240	1.0296	0.8840	1.1433	0.9604
552	0.7680	0.8295	0.8613	0.8160	0.9016	0.9108
553	0.8960	0.8295	0.8613	1.0080	0.9009	0.8989
554	1.3120	0.8800	1.0614	0.9120	0.9702	0.9212
555	1.3120	0.8295	0.8613	0.8800	0.9702	0.9504
556	0.7680	0.7245	0.8613	0.6800	0.9702	0.8976
557	0.7040	0.6820	1.0296	0.8160	1.1433	0.9384
558	0.7950	0.6758	1.2688	1.0080	1.1742	0.9384
559	0.8400	0.6510	1.0614	1.0080	1.1021	0.8811
560	0.8400	0.6510	1.0614	0.9120	1.1766	0.8989

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
561	0.8160	0.8800	0.8613	0.6800	0.9009	0.9016
562	0.8480	0.8928	0.8613	0.8800	0.9646	0.8820
563	0.9296	0.8928	0.8613	0.7600	0.9964	0.9212
564	0.8160	0.8832	0.8613	0.8800	0.8648	0.8460
565	1.0800	0.7900	0.8613	0.8400	0.8372	0.8624
566	0.7968	0.8096	1.0296	0.8160	0.9009	0.8820
567	0.8960	0.6510	0.8613	0.9120	1.1286	0.9384
568	0.6972	1.0710	0.8613	0.8400	0.9702	0.9604
569	0.6972	0.9600	1.0296	0.8840	1.0593	0.9212
570	0.8160	0.9600	0.8613	0.8800	0.9009	1.0403
571	0.9492	1.0710	1.2870	0.8840	1.0989	1.1074
572	0.8008	1.0080	1.0296	0.8160	1.0212	1.0094
573	0.8160	0.9592	0.8613	0.8400	0.9016	0.9292
574	0.8960	0.9592	0.8613	0.8400	0.9016	0.9936
575	0.7680	0.8295	0.8613	0.8800	1.0593	0.9384
576	0.6720	0.8832	0.8613	0.7600	0.8372	0.9108
577	0.8798	1.0560	0.8613	0.8400	0.9016	0.9752
578	0.8480	0.9680	1.0614	0.8800	0.8372	0.9504
579	0.7680	1.0710	0.8613	0.7600	0.8372	0.9604
580	0.8008	1.0080	0.8613	0.6800	0.9016	0.9016
581	0.6972	1.0302	0.8613	0.6800	0.8648	0.9212
582	0.7304	0.9384	0.8613	0.7600	0.8372	0.9212
583	0.7040	0.9592	0.8613	0.9120	1.1021	0.9384
584	0.8160	1.0080	0.8613	0.8400	0.9702	0.9588
585	0.7644	1.1880	1.0296	0.9120	1.1742	1.0094
586	0.8960	1.0080	1.0296	0.8800	0.9009	0.9604
587	0.8008	1.0710	1.0296	0.8160	0.9844	1.0094
588	0.8160	1.0200	0.8613	0.8400	0.8372	0.9212
589	0.8466	0.8690	0.8613	0.7600	0.9016	0.9504
590	0.7644	1.1340	1.0296	0.8160	0.8372	0.9604
591	0.7553	1.0302	1.0296	0.6800	0.8372	0.9604
592	0.7968	1.0200	0.8613	0.6800	0.8648	0.9212
593	0.7644	1.0200	1.0296	0.6800	0.8372	0.9702
594	0.8800	1.4800	1.0296	0.9120	1.0388	1.2936
595	0.9492	1.4175	1.0296	0.8160	1.1235	1.2936

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
596	0.8400	1.4850	1.0296	0.9120	1.1021	1.2204
597	0.7304	0.9600	1.0296	0.9120	1.0094	1.2204
598	0.7644	1.1340	1.0296	1.0560	1.0388	1.1187
599	0.8400	1.3500	1.0296	0.9120	1.0388	1.2936
600	1.0200	1.3500	1.0296	0.8160	1.1021	1.2936
601	0.9646	1.1880	1.0296	0.9120	1.0593	1.0506
602	0.9944	1.4175	1.7690	0.9265	1.0989	1.2936
603	0.8736	1.0800	0.8613	1.0080	0.9702	1.1074
604	1.0600	1.2555	1.0296	1.0560	1.0593	1.1074
605	1.0200	1.3635	1.2870	0.9120	0.9844	1.1074
606	0.7968	1.0800	0.8613	0.6800	1.0094	1.1187
607	0.9492	1.4175	1.4355	0.9265	1.1742	1.4896
608	0.8736	1.1340	0.8613	0.8160	0.9016	1.0094
609	0.8800	1.3500	1.0296	0.7600	0.9702	1.0170
610	0.9492	1.3635	1.2870	0.8840	1.1766	1.1074
611	1.2656	1.4175	1.2870	0.8840	1.0989	1.2936
612	0.9282	1.4175	1.2688	0.9120	1.1021	1.2936
613	0.7644	0.9384	1.0614	0.8840	1.0094	1.1187
614	0.7644	1.1340	0.8613	0.8160	0.9016	0.9604
615	0.7040	0.9486	0.8613	0.6800	0.8372	0.9702
616	0.7968	1.0800	0.8613	0.6800	0.8372	0.8460
617	0.7040	1.0800	0.8613	0.8400	0.8648	0.9604
618	0.8008	1.1340	0.8613	0.8400	0.9702	1.0094
619	0.7304	1.0080	0.8613	0.8400	0.8372	0.9016
620	0.8466	1.0302	0.8613	0.8400	0.9009	0.9212
621	0.9600	1.0200	1.2870	0.8840	1.0094	0.9270
622	0.9282	0.9600	1.0296	0.8840	0.9373	0.9604
623	0.8008	1.0560	1.0296	0.9880	0.9373	0.9588
624	0.9646	0.9680	1.0296	0.9880	0.9555	0.9612
625	0.8466	0.8928	0.8613	0.7600	0.9964	0.9936
626	0.7040	0.9600	0.8613	0.8400	0.9964	0.9384
627	0.8160	0.8690	0.8613	0.7600	0.9009	0.9936
628	0.8400	1.0710	1.0296	0.8840	1.0094	0.9702
629	0.6972	0.9680	0.8613	0.8400	0.9373	0.9108
630	0.9282	0.8611	1.0296	0.9880	0.9646	0.9384

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
631	0.8008	0.8800	1.0296	0.8840	0.9373	0.9384
632	0.8008	0.9680	1.0296	0.8160	0.9646	0.9504
633	0.8466	0.9240	0.8613	0.6800	0.9009	0.9108
634	0.6972	1.0080	1.0296	0.7600	0.9373	0.9212
635	0.7644	1.0560	1.0296	1.0080	0.9373	0.9306
636	0.8008	1.0710	1.0296	0.8160	0.8372	0.9212
637	0.7304	0.8832	0.8613	0.6800	0.9373	0.8460
638	0.7553	1.0080	1.0296	0.8160	1.0094	0.9702
639	0.8960	1.0302	0.8613	0.8800	0.9964	0.9702
640	0.7040	0.9680	0.8613	0.8800	0.9964	0.9384
641	0.7304	1.0200	0.8613	0.6800	0.9306	0.9604
642	0.9492	1.0710	1.2870	0.9265	1.1021	0.9702
643	0.9600	0.8800	1.0296	0.8840	1.0388	0.9702
644	0.8466	0.9240	0.8613	1.0080	0.9555	0.9588
645	0.6889	1.0800	0.8613	0.9120	0.9870	0.9588
646	0.7644	1.0200	1.0296	0.8160	0.9373	0.9604
647	0.8400	1.0710	1.2870	0.9265	1.1342	1.0094
648	0.7644	1.0080	1.2870	0.9265	1.0094	0.9604
649	0.7644	1.0080	1.0296	0.8840	1.0094	1.0094
650	1.1200	1.0080	1.0296	0.8840	1.0094	0.9504
651	0.7040	0.8928	0.8613	0.8800	0.9373	0.9212
652	0.7968	0.8888	0.8613	0.9120	0.9964	0.9494
653	0.7304	0.9240	0.8613	0.9120	0.9870	0.8712
654	0.8466	0.8295	1.0296	0.8160	0.9646	0.9108
655	0.6972	0.9696	0.8613	0.6800	0.9682	0.9306
656	0.8960	0.9600	0.8613	0.7600	0.9682	0.9212
657	0.9296	1.0080	1.0296	0.8400	0.9373	0.9588
658	0.7968	0.9680	0.8613	0.6800	0.9682	0.9108
659	0.8300	1.0080	1.2870	0.9265	1.1433	1.0197
660	0.9296	0.7590	0.8613	0.8400	0.9373	0.9328
661	0.7968	0.8928	1.0296	0.6800	0.9373	0.9212
662	0.6889	1.0560	0.8613	0.6800	0.9373	0.9936
663	0.7680	0.8295	0.8613	1.0080	0.9870	0.8712
664	0.8008	0.9592	1.2870	0.8840	1.0388	0.9306
665	0.8960	0.7521	0.8613	0.7600	0.9373	0.9504

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
666	0.7680	0.8295	0.8613	0.6800	0.9009	0.9504
667	0.8300	1.0710	1.2870	0.9265	1.1342	1.1074
668	0.7968	0.8888	0.8613	0.6800	0.9964	0.9108
669	0.9600	0.9240	1.0296	0.8840	0.9646	0.9292
670	0.8466	0.7900	0.8613	0.8400	0.9373	0.8976
671	0.9379	1.0464	1.0296	0.9265	1.1342	1.0197
672	0.7644	0.9680	1.2870	0.8840	1.0094	0.9898
673	0.8736	0.9680	1.0296	0.8840	1.0094	1.0584
674	0.9280	0.9486	0.8613	0.8400	0.9306	0.9604
675	0.7304	1.0200	0.8613	0.7600	0.9373	0.9212
676	0.8160	0.9240	0.8613	0.8400	0.9306	0.9292
677	1.0458	1.0710	1.4355	1.1220	1.2084	1.3068
678	0.8800	1.0200	1.2870	0.9265	1.1021	1.0094
679	1.0458	1.4175	1.7690	1.1220	1.1766	1.2936
680	0.9492	1.3500	1.2870	0.9265	1.1342	1.2936
681	0.8300	1.0908	1.0296	0.8840	1.1021	1.0170
682	0.7644	0.9936	1.0296	0.8840	1.0094	1.0170
683	0.7968	1.0044	0.8613	1.0080	1.0094	1.0170
684	1.2035	1.1340	1.4355	1.1220	1.3125	1.5504
685	0.7644	1.0908	1.0296	0.8160	0.9009	0.9270
686	0.6972	1.0800	0.8613	0.8160	0.9373	0.8820
687	0.7644	1.0800	0.8613	0.6800	0.9373	1.0094
688	0.6972	1.0200	0.8613	0.6800	0.9373	1.1187
689	0.8400	1.0710	1.2870	0.9265	1.1766	1.1074
690	1.3612	1.1340	0.8613	0.8400	0.9009	1.0197
691	0.8480	1.0800	0.8613	0.7600	0.9702	1.0403
692	0.9296	0.8690	0.8613	0.6800	0.9702	0.8976
693	0.7040	0.7245	0.8613	0.8400	0.9702	0.9078
694	0.9628	0.9680	0.8613	0.7600	1.1021	0.9494
695	0.8008	1.0080	1.0296	0.9120	0.9009	0.9494
696	0.9296	1.0710	0.8613	0.7600	0.9009	0.9604
697	0.6972	0.9592	0.8613	0.8160	0.9009	0.9108
698	0.8798	1.0710	1.0296	0.7600	0.9702	0.9588
699	0.9296	1.1340	0.8613	0.7600	0.9702	0.9306
700	0.8798	1.0908	0.8613	0.8400	0.9702	0.9270

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
701	0.7040	0.8295	0.8613	0.7600	0.9373	0.9108
702	0.7680	0.9592	0.8613	0.8400	0.8372	0.8989
703	0.7968	0.8800	0.8613	0.8400	0.9009	0.9292
704	0.8466	0.8295	0.8613	0.7600	0.9009	0.9292
705	1.0192	1.1220	1.2688	0.8400	1.1021	0.8820
706	0.8466	0.8690	1.0296	0.8160	0.9373	0.8888
707	0.9282	1.0464	1.0296	0.8800	1.0094	0.9108
708	0.7040	0.8888	0.8613	0.7600	0.9009	0.8280
709	0.8466	0.8295	1.2870	0.8160	1.2084	0.9702
710	0.6972	1.0464	0.8613	0.8400	0.8372	0.9108
711	0.6889	1.0080	0.8613	0.6800	0.9373	0.9108
712	0.7968	1.0080	1.2870	0.8840	1.1970	1.1074
713	0.6720	1.0080	0.8613	0.7600	0.9016	0.9494
714	0.7553	1.0710	1.0296	0.6800	0.8372	0.9702
715	0.7968	0.8690	0.8613	0.8400	0.8372	0.8976
716	0.9296	0.8800	1.0296	0.8840	1.1433	0.9604
717	0.8960	0.5766	0.8613	0.8400	1.0094	0.8670
718	0.6600	0.6900	0.8613	0.7600	0.9702	0.8888
719	0.7968	0.8611	0.8613	0.8400	0.8372	0.8976
720	0.6720	0.8800	0.8613	0.9120	0.9373	0.8624
721	0.7304	1.0710	0.8613	0.8400	0.8372	0.9494
722	0.8300	1.1880	1.0296	0.8160	1.0593	1.0197
723	0.8300	1.0710	1.0296	0.8840	0.9844	0.9702
724	0.8400	1.1340	1.0296	0.8840	0.9844	1.1187
725	0.7304	1.0080	0.8613	0.9120	0.9009	0.9016
726	0.8400	1.0200	1.2870	0.8840	0.9016	1.0094
727	0.7304	1.0710	0.8613	0.8400	0.8372	0.9604
728	1.0584	1.1340	1.4355	1.1220	1.0290	1.1074
729	0.9944	0.9600	1.5860	1.1220	0.9555	1.0094
730	0.9492	0.9600	1.0296	0.9265	0.9555	0.9212
731	0.9492	0.9240	1.4355	1.1220	1.0290	1.0197
732	0.9944	0.9240	1.2870	0.9265	1.0101	0.9306
733	1.0458	1.0800	1.2870	1.1220	0.9555	0.9898
734	0.7644	0.8690	1.0296	0.8840	0.9555	0.9292
735	0.9600	0.9240	1.2870	1.0355	1.0434	0.9702

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
736	1.0192	0.7521	1.0296	0.9880	0.9870	0.9078
737	0.8960	0.6200	0.8613	0.7600	0.9870	0.8585
738	1.0800	0.6820	0.8613	0.9120	0.9555	0.9612
739	0.9280	0.6510	0.8613	0.8400	0.9555	0.9434
740	0.8800	0.9680	1.2870	0.9265	1.0290	0.9936
741	0.7950	0.6820	1.0614	0.8800	0.9555	0.9010
742	0.8736	0.8611	1.0296	0.9880	1.0434	0.9504
743	0.9282	0.8295	1.0296	0.9880	0.9870	0.8888
744	0.9296	0.8295	1.0296	0.9120	0.9870	0.8811
745	0.7950	0.6510	0.8613	0.9120	0.9646	0.9612
746	0.9280	0.7521	1.0614	0.8800	0.9646	0.9612
747	0.6600	0.6200	0.8613	0.8400	0.9964	0.9180
748	0.9628	0.6758	1.0296	1.0560	0.9870	0.9434
749	1.2300	0.6200	0.8613	0.9120	0.9555	0.9010
750	1.3120	0.6758	0.8613	0.9120	0.9555	0.9328
751	0.8008	0.8295	1.0296	0.9880	0.9373	0.9108
752	1.0556	0.9592	1.0296	0.8840	1.0388	0.9936
753	1.0192	0.8690	1.0296	0.9880	0.9555	0.9504
754	0.8800	0.9240	1.2870	0.9265	1.0388	0.9306
755	0.8400	0.6820	0.8613	0.7600	1.0094	0.9434
756	0.8736	0.8611	1.0296	0.8840	1.1021	0.8888
757	0.8466	0.7590	1.0296	0.9265	1.1342	0.9292
758	0.8800	0.7590	1.2870	0.8840	1.0094	0.9504
759	0.7950	0.6200	0.8613	0.7600	0.9646	0.9010
760	0.9296	0.8690	0.8613	0.8160	0.9009	0.9504
761	0.8480	0.6758	0.8613	0.8800	0.9373	0.9612
762	0.8466	0.7521	0.8613	1.0080	1.0094	0.9612
763	0.9282	0.8690	1.0296	1.0920	0.9964	0.9612
764	0.9600	0.9240	1.0296	0.9265	1.0094	0.9108
765	0.9282	0.7521	1.0296	0.9120	1.0290	0.9944
766	0.8400	0.6262	0.8613	0.8800	1.0290	0.9010
767	0.7200	0.6262	0.8613	0.8400	0.9555	0.9010
768	1.1978	0.8800	1.7690	0.9265	1.1021	0.9212
769	0.9280	0.7245	0.8613	0.8400	0.9646	0.9384
770	0.9944	1.0080	1.2870	0.8840	1.0094	0.9212

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
771	0.9944	0.9680	1.2870	0.9265	1.1021	0.9306
772	0.9646	0.9680	1.0296	1.0920	1.0094	0.8976
773	0.9600	0.8611	1.0296	1.1440	1.1342	1.0152
774	1.0800	0.6510	0.8613	0.9120	0.9555	0.9504
775	1.4924	0.8690	1.0296	0.8840	0.9964	0.8989
776	1.1200	0.9680	1.0296	0.9265	1.1021	0.9494
777	1.0200	0.9680	1.3624	0.9265	0.9555	0.9292
778	0.8008	0.7245	1.0296	0.8840	0.9646	0.9504
779	0.7680	0.7245	0.8613	0.8400	1.0388	0.8811
780	0.9600	0.9680	1.0296	0.8840	0.9555	0.9108
781	0.8736	0.9240	1.0296	1.0080	0.9870	0.9494
782	0.9282	0.8295	1.4355	0.8840	1.0593	0.8888
783	0.7950	0.6200	0.8613	0.7600	1.0388	0.9612
784	0.7644	1.0560	1.0296	0.8160	0.9702	0.9996
785	0.8008	0.9600	0.8613	0.8160	0.9016	0.9588
786	0.7553	1.0560	1.2870	0.8840	1.0989	1.0403
787	0.8700	0.6510	0.8613	0.8400	0.9702	0.9504
788	0.6600	0.6510	0.8613	0.7600	0.9702	0.9612
789	0.7650	0.6900	0.8613	0.7600	1.1021	0.9944
790	0.9296	0.7521	0.8613	1.0944	1.0388	0.9588
791	0.9280	0.6758	0.8613	0.9120	1.0388	0.8976
792	0.6300	0.7590	0.8613	0.7600	1.0094	0.9078
793	0.7650	0.6510	0.8613	0.8400	1.0388	1.0057
794	0.8960	0.7245	0.8613	0.8400	1.1021	0.9504
795	0.7680	0.6820	0.8613	0.8400	0.9702	0.9434
796	0.7968	0.9592	0.8613	0.6800	0.8372	0.8888
797	0.6300	0.6200	0.8613	0.8400	0.9702	0.8976
798	0.9296	0.6820	0.8613	0.8400	0.9646	0.9504
799	0.7040	0.9592	0.8613	0.6800	0.9009	0.8888
800	0.6600	0.6820	0.8613	0.7600	1.0593	0.9010
801	0.6972	0.9592	0.8613	0.8400	0.9844	0.9384
802	0.7680	0.8690	0.8613	0.7600	0.9702	0.9936
803	0.8700	0.6758	0.8613	0.8800	0.9646	0.9434
804	0.8400	0.6820	0.8613	0.8800	0.9964	0.8989
805	0.6720	0.6969	0.8613	0.7600	1.0094	0.9612

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
806	0.8480	0.7590	0.8613	0.8400	0.9964	0.8712
807	0.6600	0.6758	0.8613	0.8400	1.0094	0.9180
808	0.9280	0.6820	0.8613	0.9120	1.0388	0.9328
809	0.7650	0.6820	0.8613	0.7600	1.1021	0.9944
810	0.8160	0.6820	0.8613	0.7600	0.9646	0.9612
811	0.7680	0.6758	0.8613	0.7600	0.9646	0.9612
812	0.6225	0.6510	0.8613	0.7600	1.0094	0.9328
813	0.6300	0.6820	0.8613	0.7600	1.0593	0.9434
814	0.6600	0.6510	1.1397	0.7600	1.0388	1.2236
815	0.7650	0.6758	0.8613	0.7600	1.0388	1.1704
816	0.6600	0.7245	0.8613	0.7600	0.9964	0.8989
817	0.6300	0.6417	0.8613	0.6800	0.9555	0.9078
818	0.6600	0.6510	0.8613	0.7600	1.0290	1.1704
819	0.7950	0.6510	0.8613	0.9120	0.9555	0.9180
820	0.6225	0.6900	0.8613	0.6800	0.9555	0.9612
821	0.6225	0.6510	0.8613	0.6800	0.9555	0.8989
822	0.6300	0.6820	0.8613	0.8400	1.0388	1.1704
823	0.9296	0.8690	1.0296	0.7600	1.0290	1.3699
824	0.6720	0.6900	0.8613	0.6800	0.9555	0.9504
825	0.6720	0.7245	0.8613	0.6800	0.9646	0.9504
826	0.7040	0.6900	0.8613	0.7600	0.9964	0.8989
827	0.6889	0.8611	0.8613	0.6800	0.9870	0.9504
828	0.6600	0.5766	0.8613	0.6800	0.9555	0.9612
829	0.7650	0.6510	1.0614	0.6800	1.0290	1.1837
830	0.7680	0.6820	0.8613	0.9120	0.9555	0.9752
831	0.8960	0.7590	0.8613	0.7600	1.0388	0.9964
832	0.7200	0.6200	0.8613	0.7600	0.9870	0.9434
833	0.7200	0.6200	0.8613	0.8400	0.9555	0.9434
834	0.6640	0.6758	1.1397	0.6800	1.0290	0.9944
835	0.6600	0.6262	0.8613	0.7600	0.9870	0.8989
836	0.6972	0.7521	0.8613	0.8400	1.1342	1.2236
837	0.8798	0.8295	0.8613	0.9120	1.1844	0.9078
838	0.8960	0.7900	0.8613	0.9120	1.0434	0.8888
839	1.0200	1.0080	1.0296	1.0355	0.9870	0.9604
840	1.2656	0.9696	1.0296	1.1440	0.9870	0.9604

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
841	1.0848	1.0200	1.2870	1.1445	0.9870	0.9306
842	0.8736	0.7521	1.0296	0.9880	0.9870	0.8989
843	0.8160	0.6820	0.8613	0.9120	0.9870	0.9612
844	1.0600	0.9680	1.2870	0.9880	0.9870	0.9588
845	0.7968	0.8800	0.8613	0.8400	0.9870	0.8624
846	0.8466	0.8800	0.8613	0.8400	0.9870	0.8624
847	0.9280	0.7590	1.0296	0.8800	0.9870	0.8989
848	0.7304	0.7590	0.8613	1.0080	1.0434	0.9078
849	1.0848	1.1220	1.2870	1.1445	0.9964	0.9306
850	1.1952	0.8690	1.1397	0.9120	1.0434	0.9078
851	0.9600	0.9600	1.0296	1.0920	0.9870	0.9494
852	1.0848	0.8611	1.5860	1.1990	0.9964	0.8888
853	0.9280	0.6510	1.0296	0.9120	0.9870	0.8976
854	1.0600	0.9696	1.0296	1.1856	1.0434	0.9494
855	1.3120	0.7245	0.8613	0.9120	0.9870	0.9434
856	0.8736	0.8888	0.8613	1.0944	0.9870	0.9016
857	0.8400	0.6820	0.8613	0.8400	1.0434	0.9180
858	0.9282	0.8295	1.0296	1.0080	0.9870	0.9504
859	0.8160	0.7590	0.8613	0.9120	0.9870	0.9504
860	0.9628	0.7590	0.8613	0.9120	0.9870	0.9612
861	0.9280	0.6758	0.8613	1.0080	1.0434	0.9504
862	0.7644	0.7245	1.0296	1.0080	0.9964	0.9504
863	0.7680	0.6510	1.0296	1.0080	0.9870	0.8811
864	0.9296	0.8800	0.8613	1.0560	0.9870	0.9292
865	1.0192	0.9680	1.0614	0.9120	0.9870	0.9612
866	0.8798	0.8800	0.8613	0.9120	0.9870	0.9936
867	1.2760	1.0800	1.7690	1.1220	1.0290	1.0403
868	0.8160	0.6900	0.8613	0.8400	0.9870	0.8989
869	1.0848	1.0560	1.2870	1.1445	0.9870	0.9306
870	0.8480	0.8295	0.8613	0.9120	0.9870	0.8670
871	1.2760	1.1340	1.2870	1.3860	1.0388	0.9898
872	1.0200	0.8928	1.0296	1.0560	0.9870	0.9016
873	0.9600	0.9600	1.0296	1.1856	0.9964	0.8888
874	0.9280	0.6758	0.8613	0.8800	1.0434	0.9078
875	0.8700	0.6758	0.8613	0.8800	0.9555	0.9180

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
876	1.3612	0.8690	0.8613	0.9120	1.0434	0.8976
877	1.0584	0.9600	1.2870	0.9265	0.9870	0.9702
878	0.8798	0.8295	0.8613	0.9120	0.9870	0.9504
879	1.4112	1.0560	1.2870	1.2540	1.0388	0.9936
880	1.0200	1.0464	1.0296	1.0944	0.9870	0.8888
881	0.8736	0.8611	0.8613	1.0560	0.9870	0.8976
882	0.8960	0.8611	0.8613	0.9120	0.9870	0.8976
883	1.3120	0.6510	0.8613	0.8800	1.0434	0.9434
884	1.2300	0.7590	0.8613	0.8800	0.9870	0.8976
885	0.9282	0.8800	1.0296	0.9120	1.0434	0.8820
886	0.8466	0.8184	0.8613	0.7600	0.9870	0.9292
887	0.8480	0.6758	0.8613	0.9120	1.0434	0.9612
888	0.8798	0.6510	0.8613	1.0560	0.9870	0.9612
889	0.8800	0.9240	1.0296	1.0920	0.9870	0.9108
890	0.9646	0.8690	1.0296	1.1440	0.9870	0.9434
891	0.9628	0.7521	0.8613	0.9120	0.9870	0.8976
892	0.7304	0.7590	1.0296	1.0080	0.9870	0.9078
893	0.7968	0.8611	0.8613	0.8800	1.0434	0.8712
894	0.9280	0.7590	0.8613	0.9120	1.0434	0.9612
895	0.7680	0.7521	0.8613	0.9120	1.1844	0.9612
896	0.8160	0.6969	0.8613	0.9120	1.1844	0.9328
897	0.8160	0.7245	1.0296	0.9120	1.1844	0.9434
898	0.8480	0.8611	1.1397	0.9120	0.9646	0.9936
899	1.0556	1.0080	1.1397	0.9120	0.9646	0.9504
900	1.1200	1.0080	1.2870	1.1440	1.0434	1.0152
901	0.7968	0.8184	0.8613	0.9120	0.9870	0.8976
902	1.0200	1.0200	1.0296	1.1856	0.9870	0.9898
903	0.9600	0.8800	1.0296	0.9880	0.9870	0.9604
904	0.8466	0.8800	0.8613	1.0944	1.0434	1.0152
905	1.1526	1.0908	1.2870	1.0355	1.0434	1.1187
906	0.9944	1.1340	1.0296	1.1445	0.9870	1.0197
907	1.0848	1.0710	1.0296	1.1445	0.9870	0.9898
908	1.1088	1.1880	1.0296	1.1445	0.9870	0.9604
909	0.9944	1.0710	1.2870	1.1220	0.9555	1.0094
910	1.2852	1.0710	1.0296	1.0355	0.9870	0.9306

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
911	1.2760	1.0710	1.5840	1.1220	1.0290	1.1074
912	0.9944	1.0200	1.2870	1.1445	0.9870	0.9212
913	1.2180	1.0710	1.4355	1.1220	1.0290	1.0197
914	0.9944	1.0080	1.2870	1.1445	0.9555	0.9212
915	0.9944	1.0710	1.2870	1.2540	0.9555	0.9898
916	1.0200	0.9696	1.0296	1.1445	1.0434	0.9898
917	0.9600	0.8888	1.0296	1.0920	0.9870	0.9108
918	0.9646	0.7979	1.0296	1.1440	1.0101	0.8976
919	1.0600	1.0200	0.8613	1.0920	0.9870	0.9898
920	0.8736	0.8295	1.0296	1.0080	1.1844	0.9588
921	0.8160	0.7245	0.8613	0.8800	1.0434	0.8989
922	0.7040	0.6510	0.8613	0.8400	1.0101	0.9078
923	0.8480	0.6900	0.8613	0.9120	1.0434	0.8976
924	0.9282	0.7245	1.0296	1.0560	0.9870	0.8811
925	0.8466	0.6900	1.0296	0.9120	1.0434	0.8811
926	0.9296	0.6900	1.0296	1.0080	1.0434	0.8888
927	0.8480	0.6900	0.8613	0.8800	1.0434	0.9328
928	0.7644	0.8888	1.0296	1.0080	0.9870	0.9016
929	0.8008	0.7979	1.0296	0.9120	0.9870	0.8624
930	1.2300	0.6262	0.8613	1.0560	0.9870	0.8989
931	0.7644	0.8295	1.0296	1.0560	1.1466	0.9504
932	0.8960	0.6262	0.8613	0.8800	0.9870	0.9078
933	0.7304	0.6900	1.0296	1.0560	0.9870	0.8415
934	0.8160	0.6510	0.8613	1.0080	1.0434	0.9078
935	0.9296	0.6900	1.0296	1.1440	0.9555	0.9504
936	0.7304	0.6900	1.0296	1.0080	0.9870	0.8989
937	0.7650	0.6820	0.8613	0.8800	1.0434	0.9078
938	0.7950	0.7245	0.8613	0.9120	1.0434	0.8989
939	1.2300	0.6200	0.8613	0.8400	0.9555	0.9010
940	0.7644	0.6969	1.0296	0.9120	0.9870	0.9016
941	1.0192	0.8295	1.2870	1.1440	0.9870	0.9016
942	0.8466	0.6969	1.0296	1.0560	0.9870	0.8624
943	0.8400	0.5704	0.8613	0.8400	1.0434	0.8712
944	0.8400	0.8295	1.2870	0.9880	1.0434	0.9306
945	0.8798	0.9240	0.8613	1.0560	1.1844	0.9494

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
946	0.8798	0.6900	1.3624	1.0560	0.9870	0.8722
947	0.8160	0.6820	0.8613	1.0560	1.0434	0.8989
948	0.8700	0.6200	0.8613	1.0944	0.9870	0.8811
949	0.7950	0.6200	0.8613	0.8800	1.0434	0.8415
950	0.9646	0.7245	1.0296	1.0560	1.1844	0.9434
951	0.7950	0.6200	0.8613	0.9120	0.9870	0.9078
952	1.2300	0.6200	0.8613	0.9120	0.9555	0.8670
953	0.7950	0.6820	0.8613	0.8800	0.9555	0.9180
954	0.9280	0.6200	0.8613	1.0944	1.0101	0.9504
955	0.8466	0.7900	1.0296	1.0560	0.9964	0.8722
956	0.8960	0.7590	0.8613	0.8400	1.1235	0.9078
957	0.9296	0.6417	0.8613	1.0560	0.9870	0.8722
958	0.7680	0.6262	0.8613	1.0560	0.9870	0.8585
959	0.7200	0.6510	0.8613	0.8400	0.9555	0.9612
960	0.7650	0.6262	0.8613	0.8800	0.9555	0.9180
961	0.8400	0.6200	0.8613	0.8800	1.0290	0.9605
962	0.8700	0.6200	0.8613	0.8400	1.0290	0.9010
963	0.8960	0.6200	1.0614	0.8800	1.0434	0.9180
964	0.8700	0.6262	0.8613	0.8800	0.9646	0.9180
965	0.8400	0.6200	0.8613	0.8800	0.9555	0.9328
966	0.8700	0.5766	0.8613	0.8400	0.9870	0.8670
967	0.8400	0.5704	0.8613	0.8800	0.9870	0.8415
968	0.7950	0.6200	0.8613	0.8800	0.9555	0.9010
969	0.7200	0.5766	0.8613	0.8800	1.0101	0.8585
970	0.8700	0.6200	0.8613	0.8800	0.9870	0.8670
971	0.8480	0.5766	1.0614	0.9120	1.1021	0.9010
972	0.8400	0.6262	0.8613	0.8800	0.9682	0.8811
973	0.7950	0.6200	0.8613	0.8800	0.9555	0.8585
974	0.8400	0.5766	0.8613	0.8800	0.9964	0.8585
975	0.8400	0.6200	0.8613	0.8400	0.9555	0.9504
976	0.8700	0.6262	0.8613	0.8800	1.0434	0.8415
977	0.8700	0.6510	0.8613	0.8800	1.1235	0.9605
978	0.8400	0.6200	0.8613	0.8400	0.9646	0.9180
979	0.8400	0.5766	0.8613	0.8400	0.9555	0.9180
980	0.8400	0.6200	0.8613	0.8400	0.9870	0.8330

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

GIC

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
981	0.7950	0.5766	0.8613	0.8800	0.9555	0.9434
982	0.7950	0.5766	0.8613	0.8800	1.0101	0.8585
983	0.8400	0.5766	0.8613	0.8400	1.0290	0.8670
984	0.7950	0.6200	0.8613	0.8800	1.1235	0.9180
985	0.7950	0.6510	0.8613	0.9120	0.9870	0.8670
986	0.8160	0.8690	0.8613	0.9120	0.9870	0.9504
987	1.0800	0.6510	0.8613	0.9120	1.1235	0.9434
988	1.0800	0.6510	0.8613	0.9120	1.1235	0.9180
989	0.7950	0.6200	0.8613	0.8400	1.1235	0.9434
990	0.8700	0.5704	0.8613	0.8800	0.9555	0.9180
991	1.2300	0.6820	0.8613	0.8800	1.1235	0.9612
992	0.8700	0.6200	0.8613	0.8400	1.0878	0.9612
993	0.8700	0.6200	0.8613	0.7600	1.0878	0.8989
994	1.0800	0.6200	0.8613	0.9120	1.1235	0.9612
995	1.0800	0.6200	0.8613	0.8800	0.9555	0.8670
996	0.7950	0.8690	0.8613	0.9120	0.9870	0.9384
997	0.7950	0.8611	0.8613	0.9120	0.9870	0.8888
998	0.8798	0.9680	0.8613	0.9120	0.9646	0.8976
999	0.8700	0.8611	0.8613	0.9120	0.9964	0.9504

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PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
1	1.1067	0.9483	1.2573	1.0920	1.0010	1.0692
2	1.4241	0.9483	1.7061	1.0920	1.0340	1.1340
3	1.2648	1.5330	1.8634	1.2220	1.0920	1.4580
4	1.4552	1.5808	1.8634	1.3520	1.0920	1.4580
5	1.3113	1.5330	1.3959	1.2220	1.0920	1.2420
6	1.3113	1.3167	1.5367	1.2220	1.0010	1.1730
7	1.4552	1.5352	1.5246	1.3520	1.0920	1.6695
8	1.4241	1.0246	1.3959	1.2220	1.0556	1.1340
9	1.3113	1.5184	1.3959	1.0920	1.0101	1.4175
10	1.4552	1.5330	1.7061	1.0920	1.0340	1.6695
11	1.4241	1.3832	1.7061	1.2220	1.0010	1.4175
12	1.5087	1.3965	1.2573	1.2220	1.0101	1.1340
13	1.4552	1.5914	1.3959	1.2220	1.0434	1.4175
14	1.4241	1.1235	1.3959	1.2220	1.0010	1.1730
15	1.5087	1.5184	1.3959	1.3520	1.0920	1.2420
16	1.0353	0.9870	1.0296	0.9156	1.0010	0.9792
17	1.0591	0.9135	1.2573	1.0920	1.0556	1.0098
18	1.4740	1.4746	1.2584	1.1865	1.0101	1.4175
19	1.5678	1.4600	1.2573	1.1445	0.9919	1.1730
20	1.4241	1.4600	1.2573	1.3520	1.0101	1.1730
21	1.5912	1.4746	1.9866	1.3520	1.0340	1.4580
22	1.5087	1.5184	1.9866	1.3520	1.0010	1.2420
23	1.1926	1.0400	1.5367	1.0920	1.0010	1.0098
24	1.0353	1.0400	1.0296	0.9156	1.0010	1.0098
25	1.2462	1.0246	1.6383	1.2220	1.0556	1.0692
26	1.2462	1.3578	1.0296	0.9870	0.9919	1.1615
27	1.5087	1.3984	1.6383	1.1881	1.0101	1.3770
28	1.3736	1.1663	1.3959	1.2220	1.0556	1.2420
29	1.4241	1.5330	1.7061	1.4170	1.0010	1.2420
30	1.2462	1.0593	1.0296	1.0920	1.0920	1.0605
31	1.0353	0.9135	1.2573	1.0920	1.0010	1.0368
32	1.2462	1.1128	1.2573	1.0920	1.0920	1.1730
33	0.9701	1.0700	1.0296	0.9870	0.9919	0.9696
34	1.5087	1.5048	1.3959	1.4690	1.1280	1.4310
35	1.5678	1.4746	1.2573	1.2317	1.0101	1.2420

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
36	1.3090	1.4454	1.0296	1.1187	1.0101	1.3365
37	1.2462	1.1128	1.0296	1.0246	1.0920	1.1340
38	1.1926	0.9900	1.2573	1.2220	1.0556	1.0710
39	1.2549	1.0900	1.5367	1.0920	1.0904	1.1340
40	1.2462	0.9870	1.2573	1.3520	1.0904	1.0692
41	1.1067	1.3832	1.0296	1.1445	1.0101	1.0692
42	1.2019	1.0700	1.0296	1.0920	0.9919	0.9999
43	1.6080	1.5768	1.0296	1.1865	1.0101	1.4950
44	1.5678	1.4600	1.2573	0.9156	1.1280	1.4175
45	1.4740	1.5330	1.2584	1.2317	1.0920	1.2075
46	1.4241	1.4454	1.2573	1.0246	1.1280	1.4580
47	1.0137	1.0593	0.8712	0.9870	0.9919	1.0395
48	1.0591	0.8393	1.0296	1.0920	1.0010	1.0044
49	1.9966	1.5914	1.2584	1.2317	1.0010	1.7550
50	1.6920	1.6568	1.2573	1.2317	1.0920	1.5255
51	1.1067	0.9135	1.2573	1.0920	1.0556	1.0692
52	1.0591	1.3433	1.0296	1.0920	0.9919	1.0605
53	1.0591	1.3433	1.0296	1.2220	0.9919	1.0395
54	1.1067	1.1128	1.0296	1.0920	1.0010	1.0692
55	1.1067	1.0400	1.2573	1.0920	1.0010	1.0098
56	1.0591	1.0400	1.0296	1.2220	1.0920	0.9792
57	1.0890	1.0700	0.8712	1.1445	0.9555	0.9207
58	1.0591	0.9306	1.2573	1.2220	1.0010	1.0098
59	0.9701	0.9306	1.0296	0.9156	1.0010	0.9696
60	0.8811	1.0593	0.8712	1.0296	0.8918	0.9999
61	0.9483	1.0593	1.0296	0.8820	1.0920	0.9696
62	1.0591	0.9483	1.6383	1.0920	1.0340	1.0692
63	1.3080	1.0593	0.8712	1.1187	1.1280	1.2870
64	0.9844	0.9900	0.8712	1.0791	1.0464	0.9450
65	1.2753	1.3300	0.8712	1.1187	1.0101	1.1025
66	1.0764	1.0700	0.8712	0.9156	0.9555	1.0395
67	1.0593	1.0807	0.8712	1.1187	0.9919	1.1340
68	0.9999	0.9951	0.8712	1.0296	0.9555	1.1385
69	1.2733	1.3832	1.0296	1.1445	1.0101	1.1340
70	1.2019	1.3433	1.0296	1.1445	1.0434	1.2420

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
71	0.8811	1.0000	1.0296	1.0296	0.9870	0.9792
72	1.2019	1.0246	1.0296	0.9156	1.0920	0.9792
73	1.2753	1.3433	1.0296	1.0920	1.0246	1.1340
74	1.2019	1.3433	1.0296	1.1445	0.9555	1.0605
75	1.1009	1.0807	1.2584	1.0246	1.0101	0.9504
76	0.9701	1.0100	1.2573	0.9156	0.9919	0.9792
77	0.9207	0.9951	1.0296	1.0920	0.9555	0.9504
78	0.9483	0.9306	1.0296	0.9156	1.0101	0.9792
79	0.9701	1.0400	1.0296	0.9156	1.0101	0.9792
80	0.9207	0.9400	0.8712	1.0920	0.9919	0.9486
81	1.0591	1.0593	1.2573	0.9156	1.0101	1.0692
82	1.1067	1.0807	1.2573	1.0246	0.9555	1.0368
83	1.0591	1.0807	1.2573	1.0246	0.9555	0.9696
84	1.0137	1.0100	1.0296	0.8820	0.9919	0.9792
85	1.0137	1.0100	1.0296	0.9156	1.0101	0.9792
86	0.9483	1.3300	0.8712	0.8820	0.9555	0.9999
87	1.0591	0.9306	1.0296	0.9156	1.0920	0.9696
88	1.1067	1.0807	1.2573	1.0246	0.9919	0.9999
89	1.0120	0.6138	0.8712	1.0920	0.9555	0.8686
90	0.9701	0.9900	1.2573	0.9156	0.9919	0.9801
91	0.9701	0.9494	0.8712	0.9156	0.9919	0.9486
92	0.8811	1.0100	0.8712	0.8820	0.9555	0.8989
93	0.8811	1.0000	0.8712	0.9306	0.9555	0.8811
94	1.2019	1.0700	1.0296	0.9156	1.0434	1.0605
95	0.9207	1.1235	0.8712	0.9870	0.9870	0.9999
96	0.9207	0.9844	0.8712	1.0791	0.8918	0.9408
97	0.9999	0.9300	0.8712	1.0791	0.9212	1.0368
98	1.1009	0.9048	1.0296	0.9156	1.0920	0.9696
99	0.9207	0.9494	1.0296	0.9870	0.9555	0.9393
100	1.3534	1.3167	1.0296	0.9156	1.0246	1.0710
101	0.8556	0.9200	0.8712	1.0296	0.9212	1.0395
102	0.9483	1.0400	1.2573	0.9156	1.0434	1.0395
103	0.8811	1.0100	0.8712	0.9870	0.9555	0.9696
104	0.9999	1.0100	0.8712	0.9306	0.9555	0.9207
105	1.0137	1.0807	1.0296	0.9870	0.9555	0.9696

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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
106	0.9999	0.9300	0.8712	0.8316	0.8918	0.9393
107	1.2462	1.0700	1.0296	0.9156	1.0101	1.0098
108	1.1067	1.0700	1.0296	0.9870	0.9919	1.0692
109	0.9207	0.9200	1.0296	0.9156	1.0101	1.0509
110	1.2753	1.1128	1.0296	0.9870	1.0101	1.1187
111	1.4740	1.3433	1.7061	1.4170	1.0101	1.0710
112	1.2019	1.3300	1.0296	1.0246	0.9555	1.0692
113	1.6080	1.1235	1.8189	1.3520	1.0010	1.0395
114	1.4338	1.3965	1.7061	1.4170	1.0556	1.1025
115	1.1067	1.3167	1.0296	1.1336	0.9870	1.1340
116	1.1880	1.0593	0.8712	0.9870	1.0246	1.0692
117	1.3923	1.1128	1.0296	1.1336	1.0434	1.0692
118	1.1880	1.0593	1.5367	1.0246	1.0434	1.0692
119	1.5912	1.4497	1.9866	1.4170	1.0010	1.2995
120	1.4338	1.3832	1.7061	1.4170	1.0010	1.1340
121	1.4960	1.5914	1.8634	1.4170	1.0904	1.4175
122	1.4241	1.3965	1.9866	1.2220	1.0556	1.2075
123	1.3534	1.3832	1.2573	1.3520	0.9919	1.1340
124	1.1583	0.9300	0.8712	1.1187	0.9555	1.0044
125	1.3090	1.4497	1.0296	1.1865	1.0101	1.1865
126	1.4338	1.4497	1.2573	1.2220	1.0920	1.1340
127	1.5087	1.3965	1.2573	1.4690	1.0101	1.1340
128	1.5678	1.3965	1.2573	1.1881	1.0101	1.0692
129	1.6497	1.5914	1.5367	1.4690	1.0920	1.2075
130	1.0120	0.9400	0.8712	1.1187	0.8918	0.9792
131	1.1009	1.1128	1.0296	1.1336	0.9919	1.0044
132	1.2549	1.5914	1.2573	1.4170	1.0920	1.1730
133	1.3534	1.0246	1.2573	1.3520	1.0556	1.0692
134	1.5087	1.4497	1.7061	1.4170	1.0920	1.1340
135	1.3090	1.0246	1.0296	1.3520	1.0010	1.0368
136	1.4338	1.0500	1.2573	1.3520	1.0010	1.0692
137	1.3923	1.0900	1.2573	1.2220	1.0101	1.1340
138	1.1009	1.1128	1.0296	1.1445	0.9212	1.0044
139	1.5087	1.1663	1.8189	1.3520	1.0556	1.1340
140	0.9207	0.9494	1.0296	1.0920	0.8918	1.0044

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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
141	1.0593	1.0000	0.8712	1.0791	0.8918	0.9486
142	1.1583	0.9776	1.0296	1.0791	0.9212	1.0044
143	1.6080	1.3300	1.2573	1.2317	1.0920	1.1025
144	1.2753	1.1663	1.0296	1.1187	0.9870	1.0368
145	1.2753	1.1235	1.2573	1.1881	0.9870	1.0080
146	0.9844	0.9776	0.8712	1.0791	0.9870	0.9612
147	1.3923	1.1663	1.2573	1.1336	1.0434	1.0692
148	1.6497	1.5914	1.9866	1.4170	1.0556	1.2075
149	1.2462	1.4600	1.2573	1.1881	1.1280	1.2075
150	1.5912	1.4497	1.9866	1.2220	1.0010	1.4175
151	1.2733	1.3167	1.0296	1.1881	1.0920	0.9999
152	0.9207	0.9306	0.8712	0.9870	0.9870	1.0044
153	1.0593	0.9494	0.8712	0.9870	1.0080	1.0692
154	0.8556	0.8613	0.8712	0.9306	0.9212	0.9612
155	1.1009	0.9306	0.8712	0.8820	1.0101	0.9486
156	1.0137	1.0100	1.0296	0.8820	0.9870	0.9792
157	1.0591	0.9776	1.2573	0.9156	1.0010	1.0368
158	0.8811	0.9306	0.8712	1.0920	0.9870	1.0044
159	0.8613	1.0100	0.8712	0.9306	0.9555	1.0044
160	0.9207	0.9494	0.8712	1.0296	0.9555	0.9486
161	0.8613	0.8613	1.0296	0.9156	1.0434	0.9486
162	1.1926	1.0807	1.3959	1.0920	1.0101	1.0098
163	0.9207	0.8787	0.8712	0.9870	1.0246	1.0044
164	0.9483	0.9776	1.2573	0.9156	1.0101	0.9696
165	0.9701	0.9135	1.2573	1.0920	1.1280	0.9792
166	1.1009	1.0100	1.2573	1.0246	0.9555	1.0368
167	0.9483	0.9048	1.0296	0.9156	1.1280	1.0368
168	0.9701	0.9776	1.0296	1.1336	1.0434	0.9792
169	0.9207	0.9494	0.8712	1.0791	0.9212	1.0044
170	1.1926	1.3300	1.3959	1.0920	0.9919	1.0395
171	1.2462	1.3433	1.3959	1.0920	0.9919	0.9801
172	0.8585	0.7777	0.8712	1.1187	0.9486	0.9720
173	0.8556	0.8648	0.8712	0.9306	1.0710	0.9696
174	0.8800	0.6200	0.8712	0.7896	1.0710	0.9450
175	1.0200	0.6800	0.8712	1.0791	1.0710	1.0057

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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

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176	0.8188	0.9200	0.8712	0.9870	1.2543	0.9450
177	0.8004	0.9844	1.0296	0.9870	1.2240	1.0350
178	0.8556	0.9300	0.8712	0.9870	1.1844	0.9450
179	0.8556	0.8091	1.0296	1.0791	1.0290	0.9393
180	0.9292	0.8742	0.8712	1.0296	1.2348	0.9450
181	0.9095	0.7072	0.8712	0.9492	0.9996	0.9288
182	0.7565	0.7700	0.8712	1.0920	1.1550	1.0057
183	0.8811	0.9300	0.8712	0.8820	1.1655	0.9504
184	0.9095	0.6200	0.8712	1.0791	1.0656	0.9450
185	1.0200	0.8613	0.8712	1.0791	1.1118	0.9345
186	0.7565	0.8648	0.8712	1.0791	0.8928	0.9408
187	0.7905	0.9844	0.8712	0.8736	0.8928	0.9702
188	0.8613	0.9200	1.0296	0.9870	1.0710	0.9504
189	0.8613	0.9300	1.0296	0.9156	1.2240	0.9801
190	0.9711	0.6800	0.8712	0.9156	0.9996	0.9180
191	1.0200	0.6324	0.8712	1.0296	1.1322	1.0170
192	0.8613	0.9300	0.8712	0.8820	1.0710	1.1385
193	1.0593	1.0700	0.8712	0.9306	1.0290	0.9696
194	0.8585	0.5766	0.8712	0.9306	1.2240	1.0170
195	0.9844	0.9048	0.8712	1.1187	0.8928	0.9612
196	0.8881	0.6262	0.8712	1.0296	1.0464	0.9288
197	0.9350	1.0100	0.8712	0.9492	0.9588	0.8989
198	0.8585	0.9951	0.8712	1.1187	0.9024	0.9504
199	1.0120	0.9951	0.8712	0.9492	1.0152	0.8910
200	0.8585	0.9400	0.8712	0.8736	0.9024	0.8811
201	0.9095	0.9400	0.8712	0.9492	0.9588	0.9792
202	0.9350	1.0100	0.8712	0.9492	0.8928	1.0368
203	0.9207	0.9200	0.8712	1.0791	1.0710	0.9801
204	0.8811	0.8648	0.8712	1.0296	0.9408	1.0395
205	0.9945	0.8742	0.8712	0.9492	0.9765	0.8640
206	0.9292	1.0000	1.0296	1.1445	0.8928	1.0605
207	0.9844	0.9300	0.8712	1.0791	1.0584	0.9450
208	0.8188	0.8742	0.8712	1.1187	0.9408	1.0044
209	0.8881	0.6868	0.8712	0.9492	1.0710	1.0170
210	0.9945	0.9951	0.8712	0.9492	0.9486	0.9450

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PURE PREMIUM BAND

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211	0.9207	1.4454	0.8712	1.1187	0.9951	1.4175
212	1.5087	1.6416	0.8712	1.0791	1.1340	2.0670
213	0.9292	0.9951	0.8712	1.0296	0.9951	0.9450
214	0.9207	1.0000	1.0296	1.1865	1.0058	0.9450
215	0.8556	1.0700	1.0296	1.1445	1.0058	1.0290
216	1.0593	1.0500	0.8712	1.0920	0.9408	1.2090
217	0.9945	0.8085	0.8712	1.0791	1.0710	1.0044
218	0.8585	1.0000	0.8712	0.9156	1.0290	0.8370
219	0.9350	0.9494	0.8712	0.9492	1.0710	1.0368
220	0.9095	0.7072	0.8712	1.0791	0.9996	0.9030
221	1.2367	0.9135	0.8712	0.9492	1.0080	1.1570
222	0.8188	0.9306	1.0296	1.0296	0.8928	0.9999
223	0.9844	0.8393	0.8712	1.1187	1.0710	0.9345
224	0.8556	0.9951	0.8712	1.0296	0.9951	0.8910
225	0.9095	0.9200	0.8712	0.9492	0.8928	0.8989
226	0.7905	0.9200	0.8712	1.0791	1.0058	0.8910
227	0.8556	0.9200	0.8712	1.0296	0.8742	0.9792
228	0.8811	1.0100	1.0296	1.0920	0.8742	0.9696
229	0.9945	1.0900	0.8712	0.9492	1.0080	1.1570
230	0.8556	0.9300	0.8712	1.0791	1.0509	1.0350
231	0.9292	0.9200	0.8712	1.0791	1.0044	0.9450
232	0.9207	1.2369	1.0296	0.9306	0.9408	1.0350
233	1.0353	1.2236	1.7061	1.3520	1.1118	1.0290
234	0.9095	0.9844	0.8712	0.9156	0.9951	0.9450
235	0.9292	0.9951	0.8712	0.8736	0.9408	0.8910
236	0.9999	0.9300	0.8712	1.0791	1.1340	1.0350
237	0.8556	1.0700	0.8712	0.9156	1.0486	1.0350
238	0.7905	0.9200	0.8712	0.7896	0.8928	0.9702
239	0.8556	0.9951	0.8712	1.0296	1.0486	0.9450
240	0.9701	0.9200	1.0296	0.9870	1.0080	0.9504
241	0.9701	1.2369	1.0296	1.1445	0.9996	1.0350
242	0.8556	0.9844	0.8712	1.0296	0.9996	0.9450
243	0.7905	0.9844	0.8712	0.9492	1.0584	0.8910
244	0.9711	0.9951	0.8712	0.7056	1.1844	0.8910
245	0.8585	0.8742	0.8712	0.9156	0.9951	0.9702

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PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
246	0.9945	0.9300	0.8712	0.7896	0.9408	0.9408
247	0.9292	0.8742	0.8712	1.0791	1.0584	0.8910
248	0.9292	0.9951	0.8712	1.1187	1.1718	0.9450
249	0.7905	0.9951	0.8712	0.9156	1.1844	0.9450
250	0.9292	1.0700	1.0296	1.0791	0.9951	0.9450
251	0.9945	0.9200	0.8712	0.9492	0.9951	0.8910
252	0.8585	0.9200	0.8712	0.8736	0.9951	0.8910
253	0.9292	0.9200	0.8712	0.9156	1.0622	0.8640
254	0.8585	1.0700	0.8712	0.8736	1.0058	0.9702
255	0.8585	1.0000	0.8712	0.9156	1.0058	0.8640
256	1.0593	1.3300	0.8712	1.0920	1.0584	1.1615
257	1.1926	1.6568	0.8712	0.7056	1.0058	1.2420
258	1.2462	1.5352	1.0296	0.8820	1.1844	1.6695
259	1.1583	1.5914	0.8712	0.7896	1.0290	1.1730
260	1.2733	1.5960	0.8712	0.8736	1.1340	1.7967
261	0.8004	0.9844	0.8712	0.8820	1.2600	0.9450
262	0.9844	1.4600	0.8712	0.8316	1.0622	1.2420
263	0.7395	0.6324	1.0296	0.8820	1.1550	0.9393
264	0.7905	0.8008	0.8712	0.9870	1.2960	1.0044
265	0.9095	0.7777	0.8712	1.0791	1.1772	0.9078
266	0.9130	0.7161	0.8712	0.9492	1.0710	0.9612
267	0.9130	0.8004	0.8712	0.9492	1.0290	0.9207
268	0.7905	0.7161	0.8712	1.0296	0.9212	0.9393
269	0.8556	0.7623	0.8712	0.9870	1.0080	0.9612
270	0.9360	0.6262	0.8712	0.9306	1.0080	0.8686
271	0.8383	0.6138	0.8712	1.0296	1.1520	0.9180
272	0.9350	0.6868	0.8712	0.9306	1.0710	0.9180
273	0.8080	0.6448	0.8712	0.8316	1.0560	0.9450
274	0.9095	0.7777	0.8712	0.9306	1.2960	0.9612
275	0.7905	0.8008	0.8712	1.0920	1.1445	1.0044
276	0.8585	0.7140	1.0296	0.9870	1.3108	1.0044
277	0.9945	0.6868	0.8712	1.0920	1.1772	0.9180
278	0.9844	0.9048	1.0296	1.1445	1.2840	1.0044
279	0.8881	0.7072	0.8712	1.0791	1.0080	0.9720
280	0.8383	0.6732	0.8712	0.8316	1.0560	0.9612

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
281	0.7120	0.6138	0.8712	0.8316	1.0560	0.9030
282	0.9960	0.6448	0.8712	0.9306	1.1520	0.9720
283	0.9945	0.7072	0.8712	0.9870	1.1340	0.9180
284	0.9945	0.7084	0.8712	1.0296	1.1445	0.9612
285	0.7905	0.6758	0.8712	1.1865	1.2430	1.0044
286	0.9292	0.6262	1.0296	0.9306	1.2600	0.9450
287	0.7387	0.6448	0.8712	1.0296	1.2240	0.9720
288	0.9350	0.8700	0.8712	0.9492	1.0710	0.9486
289	1.0120	0.9135	1.2584	1.1865	1.1322	1.0080
290	0.9960	0.8787	0.8712	0.9156	1.0710	0.9393
291	0.9360	0.5766	0.8712	0.9306	1.0080	0.9288
292	0.9350	0.6868	0.8712	1.1187	1.0710	0.9450
293	0.8585	0.6510	0.8712	0.9306	1.1880	0.9345
294	0.9350	0.8008	0.8712	1.1187	1.1772	0.8989
295	1.1040	0.9400	0.8712	1.0296	1.0509	1.0395
296	1.1990	1.5768	0.8712	0.8316	1.1235	2.0670
297	0.7905	0.6262	0.8712	0.9870	1.0656	0.9180
298	0.7719	0.6510	0.8712	0.8316	1.1520	0.9288
299	0.9207	1.0900	0.8712	0.8316	1.0560	1.0692
300	0.8383	0.7072	0.8712	0.9156	1.0584	0.9180
301	0.9701	0.9048	1.0296	1.2220	1.0434	1.0368
302	1.0890	1.1235	0.8712	1.0791	1.0486	1.2075
303	1.0764	0.9396	0.8712	0.9870	1.0080	0.9765
304	1.0764	0.8008	0.8712	1.0920	0.9870	0.9720
305	1.1583	0.8613	0.8712	0.9870	0.9870	0.9078
306	0.9130	0.8091	0.8712	0.9306	1.1844	0.8910
307	0.9844	0.6868	1.0296	0.9870	1.0486	0.9486
308	0.8556	0.9494	0.8712	0.8820	0.9870	0.9078
309	0.7719	0.8613	0.8712	0.7896	0.9408	0.9078
310	0.8881	0.8787	0.8712	1.0296	0.9212	0.9612
311	1.0137	0.8393	1.0296	1.0920	1.1280	1.0044
312	0.8811	0.9400	0.8712	1.1336	1.0656	1.0044
313	0.9207	0.9400	0.8712	0.9870	0.9212	0.9696
314	0.7565	0.8700	0.8712	1.0296	0.9212	0.8989
315	0.9701	0.8613	1.0296	0.9156	1.0434	1.0368

State: **CALIFORNIA**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
316	0.8556	0.9306	0.8712	0.9156	1.0080	0.9792
317	0.9130	0.6200	0.8712	0.9306	1.0710	0.8772
318	1.1040	0.8787	0.8712	1.0296	0.9951	0.9999
319	0.9207	0.9048	1.0296	0.9156	1.0434	1.0044
320	1.0200	0.9483	0.8712	0.9870	1.0584	1.1187
321	0.8556	0.8742	0.8712	0.9306	1.0080	1.0368
322	0.8585	0.9483	0.8712	1.0920	1.0080	0.9345
323	1.0764	0.7777	0.8712	1.1881	0.9951	0.8989
324	1.0593	0.9483	1.0296	1.2317	1.1118	0.9345
325	0.9207	0.9135	1.0296	1.0246	1.0464	1.0044
326	0.9350	0.7072	0.8712	0.9306	1.0290	0.9720
327	0.9095	0.8613	0.8712	1.0920	1.0464	0.9765
328	1.0764	0.9400	0.8712	0.9870	0.9212	0.9486
329	1.1040	0.7344	1.0296	0.9870	1.1118	0.9720
330	0.9350	0.6262	0.8712	1.0296	0.9486	0.8772
331	1.3778	0.6324	0.8712	0.7056	1.0710	0.9720
332	1.0200	0.6262	1.0296	0.8316	1.0486	0.9288
333	1.1583	0.7777	1.0296	1.0920	0.9996	0.9720
334	1.0764	0.7412	1.0296	1.0920	1.0080	0.9078
335	0.9292	0.9870	0.8712	1.1445	1.0080	1.0044
336	0.9960	0.6758	0.8712	1.0296	1.0080	0.8686
337	0.9350	0.8787	0.8712	0.9870	0.9408	0.9345
338	1.1920	0.6262	0.8712	0.9306	1.0080	0.8514
339	0.9701	0.9776	1.0296	1.0920	0.9870	1.0044
340	1.2019	0.9048	1.2573	1.4690	1.1322	1.0368
341	1.0137	0.8613	1.0296	0.9156	1.0246	0.9792
342	1.0764	0.7623	0.8712	1.1445	0.9996	0.9450
343	1.0137	0.9048	1.0296	1.0246	1.0434	1.0044
344	1.1009	0.9135	1.0296	1.0246	1.0101	1.0368
345	0.9483	1.0100	1.0296	1.0246	0.9919	0.9792
346	0.9207	0.9776	1.0296	0.9156	0.9919	1.0044
347	0.9701	0.9306	1.0296	0.9156	0.9919	0.9792
348	0.8556	0.7084	0.8712	0.9870	0.9212	0.9393
349	0.8188	0.8008	0.8712	1.0296	0.9996	0.9450
350	0.9095	0.7140	0.8712	1.0791	1.0080	1.0057

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USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
351	0.9999	0.9494	1.0296	1.0246	1.0080	0.9393
352	0.9207	0.8008	1.0296	0.8820	1.0434	0.9078
353	0.9350	0.6800	0.8712	0.8820	1.0710	0.9612
354	0.9207	1.0593	0.8712	1.0791	1.0486	0.9801
355	0.9207	1.0000	1.0296	1.0296	1.0509	1.0290
356	0.9292	0.8008	1.0296	1.1336	1.0246	0.9612
357	1.0890	0.8613	1.0296	1.1336	1.0246	0.9612
358	1.1663	0.9776	1.0296	1.0920	0.9996	1.1340
359	1.0120	0.8742	1.0296	1.1445	0.8742	0.8989
360	0.9207	0.9306	0.8712	1.0296	0.9408	0.9612
361	0.8811	0.9200	0.8712	1.1445	0.9486	0.9999
362	1.0593	0.9300	0.8712	1.0296	1.0622	0.8910
363	0.9844	0.8613	1.0296	1.0296	0.8928	0.9078
364	1.1583	0.9400	1.0296	1.1445	0.9486	0.9486
365	0.8811	0.9951	1.2573	1.0296	0.9212	0.9792
366	0.8556	1.0000	0.8712	0.9156	0.8742	0.9765
367	0.8811	1.0000	1.0296	0.9870	0.8463	0.9393
368	0.9844	1.0100	0.8712	0.9156	0.8836	0.9612
369	1.1009	1.3300	1.0296	1.1445	0.9212	1.0692
370	0.9207	1.0000	1.0296	0.9306	0.8463	0.9792
371	0.9207	0.9844	1.0296	1.0791	0.8742	0.9696
372	0.8881	0.9400	0.8712	0.9156	0.8742	0.8989
373	0.8556	0.9300	0.8712	0.9156	0.9870	0.9765
374	0.9207	1.0700	1.0296	1.0791	0.9555	0.9393
375	1.4110	1.2236	0.8712	0.9492	0.9555	0.8640
376	0.9999	0.9306	1.0296	1.1187	0.8918	0.9696
377	1.1663	1.0000	1.0296	1.0920	0.9555	0.9393
378	0.9844	1.0100	0.8712	1.0791	0.9212	0.9792
379	1.0593	1.0100	0.8712	1.0791	0.9555	0.9486
380	0.8556	0.9200	0.8712	1.1187	0.8742	0.9078
381	0.9292	0.9200	0.8712	0.9156	0.8742	0.9792
382	1.0764	1.0400	0.8712	0.9156	0.9870	1.2480
383	0.9292	1.0000	0.8712	1.1187	0.9870	1.0395
384	0.9207	1.0700	0.8712	1.0791	0.9870	0.9765
385	0.8004	0.9200	0.8712	0.9492	0.9555	0.9486

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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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PURE PREMIUM BAND

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386	0.8585	0.9494	0.8712	0.9156	0.9486	0.8640
387	0.8585	0.9300	0.8712	0.9156	0.9212	0.9612
388	0.8811	0.9776	0.8712	1.0920	1.0464	0.9450
389	0.9844	0.9951	0.8712	1.1187	0.9486	0.8640
390	1.1926	1.0100	1.3959	1.2220	0.9919	0.9504
391	0.7905	0.9400	0.8712	0.9156	0.8742	0.9504
392	1.0593	0.9300	0.8712	1.0920	0.9555	1.0368
393	0.8613	1.0000	1.0296	1.0296	0.9212	1.0044
394	1.1926	1.0807	1.2573	1.2220	1.0101	0.9999
395	0.8613	0.9306	0.8712	0.9870	0.8918	0.8989
396	0.8556	0.8613	0.8712	1.0296	0.8918	0.9720
397	0.8811	1.0100	1.0296	0.8820	0.8928	0.9486
398	0.9207	0.9494	1.0296	1.0920	1.0044	1.0044
399	0.8811	1.0100	0.8712	1.0791	0.9212	1.0044
400	0.9292	0.9400	0.8712	1.0296	0.8742	0.8811
401	1.0764	0.8648	0.8712	1.0296	0.8918	0.9801
402	0.9945	0.9400	0.8712	0.8736	0.8742	0.9207
403	0.9292	0.9494	0.8712	1.1187	0.8463	1.0368
404	0.9711	0.8787	0.8712	0.8736	0.8742	0.9090
405	1.0890	0.9776	0.8712	1.1187	0.9212	0.9612
406	0.8881	0.7777	0.8712	0.8736	0.8742	0.9180
407	0.9207	0.9048	1.2584	0.9156	1.0434	0.9696
408	0.9292	0.9048	1.0296	1.0920	0.9212	0.9207
409	1.0120	0.8085	1.0296	1.0296	1.0246	0.9612
410	0.9999	0.9306	1.0296	1.1336	0.8928	1.0605
411	1.1880	1.0100	1.0296	0.9870	0.9408	1.1340
412	0.7565	0.6732	0.8712	0.9306	0.9870	0.8772
413	1.0120	0.9048	0.8712	1.0296	0.9212	0.9450
414	0.7905	1.0000	0.8712	0.9156	0.8928	0.9504
415	0.9292	0.9900	0.8712	0.8736	1.0080	0.9504
416	0.9350	0.9300	0.8712	0.9492	0.9212	0.9207
417	0.9207	1.1663	1.0296	1.0296	1.0080	1.0692
418	0.9350	0.9776	1.0648	0.9492	0.9870	1.0044
419	0.7719	0.8700	0.8712	0.8736	0.8742	0.8811
420	0.9095	0.6732	1.0296	0.9870	1.0080	0.8989

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

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421	1.0764	0.7412	1.6383	1.1865	1.1136	1.0044
422	0.8881	0.6510	0.8712	0.8316	1.0464	0.9180
423	0.7905	0.6800	1.0296	1.0920	1.0246	0.9612
424	0.9095	0.6758	0.8712	0.9306	1.0656	0.9345
425	0.7565	0.6758	1.0296	0.8820	1.2240	0.9612
426	0.8800	0.6262	0.8712	0.9156	1.0290	0.9180
427	0.7565	0.6510	1.0296	0.9870	1.0080	0.9288
428	0.7905	0.7412	1.0296	0.8820	1.1832	0.9486
429	0.7719	0.6758	1.0296	0.8820	1.1550	0.9345
430	0.8811	0.8393	1.2573	0.8820	1.0464	0.9078
431	0.8881	0.6868	0.8712	0.9156	1.0290	0.9720
432	1.1040	0.7140	0.8712	1.1445	1.0080	0.9612
433	1.1040	0.9396	1.0648	0.9870	1.0246	0.9612
434	0.8585	0.6510	1.0296	0.8820	1.0464	0.9180
435	0.8881	0.5766	0.8712	1.1187	1.0464	0.9030
436	1.3778	0.6138	0.8712	1.0791	1.0246	0.9288
437	0.9207	0.7412	1.2573	1.0246	1.1136	0.9792
438	0.9095	0.7140	0.8712	0.9306	1.0080	0.9090
439	1.0593	0.8085	1.0296	1.1445	1.0246	0.9450
440	0.8383	0.6800	0.8712	0.8820	1.0080	0.8772
441	0.9350	0.7161	0.8712	1.0296	1.0584	0.9114
442	0.7719	0.6758	1.0296	0.9156	1.1136	0.9720
443	0.9945	0.6758	1.0296	0.8820	1.2240	0.9612
444	0.9360	0.6262	0.8712	1.0791	1.0710	0.9288
445	0.9844	0.7140	0.8712	1.0296	1.0080	0.9720
446	0.6960	0.6200	0.8712	0.9156	0.9996	0.9720
447	1.3778	0.6138	0.8712	1.0296	1.0080	0.8772
448	0.8556	0.6868	1.0296	0.9870	1.1118	0.8989
449	0.8188	0.6758	1.0296	0.9870	1.0656	0.9612
450	0.7387	0.6758	0.8712	0.7896	1.0080	0.9720
451	1.1040	0.8393	1.3416	1.0920	1.0560	0.9612
452	0.7565	0.6448	0.8712	1.0296	0.9996	0.9288
453	0.9095	0.6758	1.2584	0.8820	0.9408	0.9078
454	0.9292	0.7344	1.0296	0.9870	1.0656	0.9486
455	0.8383	0.6758	0.8712	0.8316	0.9996	0.9288

State: **CALIFORNIA**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
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PURE PREMIUM BAND

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456	0.8556	0.6696	1.0296	0.9306	1.1322	0.9090
457	0.8188	0.7140	1.0296	0.9870	1.1322	0.9078
458	0.8556	0.8613	1.0296	1.0296	0.8928	0.8811
459	0.9350	0.6262	0.8712	1.0296	1.0246	0.9288
460	1.3708	0.8085	1.2584	0.9306	1.1520	0.9180
461	0.9207	0.7623	1.0296	0.8820	1.0080	0.9612
462	0.9999	0.9900	1.0296	0.8820	1.0656	0.9696
463	0.9292	0.8613	1.0648	0.9870	1.0464	0.9078
464	1.0890	0.8613	1.0296	1.1865	1.0246	1.0368
465	0.9292	0.9776	1.0648	1.0296	1.0656	0.9078
466	0.9292	0.9483	1.1352	1.1445	1.0246	0.9612
467	0.7719	0.7623	0.8712	0.9492	0.8928	0.8910
468	0.7905	0.9306	0.8712	0.9492	0.8928	0.8989
469	0.9711	0.7623	0.8712	0.7896	0.8928	0.9180
470	0.8080	0.7140	0.8712	0.9492	0.9486	0.9180
471	0.8881	0.6758	0.8712	0.9156	1.0710	0.9030
472	0.7719	0.6732	0.8712	0.8736	0.9588	0.8772
473	0.9360	0.6324	0.8712	0.9492	0.9996	0.8514
474	0.7905	0.7412	0.8712	0.8316	0.8928	0.9078
475	0.8800	0.8008	0.8712	0.9492	0.8928	0.8772
476	0.7440	0.6448	1.0648	0.9492	1.0710	0.9030
477	1.3778	0.8008	0.8712	0.9156	0.8928	0.9090
478	0.7565	0.7140	1.0296	0.8820	0.9408	1.0044
479	0.8800	0.7072	0.8712	0.9492	0.9408	0.9288
480	0.7719	0.7161	0.8712	0.8736	0.9996	0.9207
481	0.9711	0.6732	0.8712	0.7896	1.0058	0.8989
482	0.8383	0.6324	0.8712	0.9306	0.9408	0.9720
483	0.9711	0.7777	0.8712	0.9492	0.9408	0.8686
484	0.7387	0.6732	0.8712	0.7056	0.9588	0.9180
485	0.7719	0.8008	0.8712	0.9492	0.9996	0.9720
486	0.7719	0.7072	0.8712	0.9492	1.0710	0.8686
487	0.7387	0.7140	0.8712	0.9492	1.1025	0.9450
488	0.7565	0.8008	0.8712	0.8316	0.9408	0.9207
489	0.7565	0.7623	0.8712	1.0296	0.8928	0.8989
490	0.7395	0.7072	1.0296	0.8820	1.0710	0.9207

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
491	0.9711	0.8085	0.8712	0.8736	0.9408	0.9720
492	0.9130	0.6800	0.8712	0.8736	0.8928	0.8772
493	0.8560	0.6510	0.8712	1.0296	1.0290	0.8686
494	0.9360	0.5704	0.8712	1.0791	0.9408	0.8686
495	0.8800	0.5766	0.8712	0.7896	1.0710	0.8686
496	1.3778	0.6262	0.8712	1.2317	0.9996	0.8772
497	1.1920	0.6262	0.8712	0.9492	1.0584	0.9450
498	1.3778	0.6510	0.8712	1.0791	1.0080	0.8772
499	0.9945	0.6200	1.0648	1.1865	0.9951	0.8686
500	1.3280	0.6200	0.8712	1.0296	1.0710	0.9288
501	1.6434	0.7412	1.0296	1.1881	1.0246	0.9450
502	1.2733	0.9776	1.2573	1.4170	1.0246	1.0044
503	0.9600	0.5704	0.8712	0.9492	1.0584	0.9288
504	1.2733	0.8393	1.2573	1.4170	1.0101	0.9345
505	1.1880	0.6800	1.0296	1.1336	1.0246	0.9720
506	0.9130	0.6510	0.8712	1.0296	1.0080	0.9288
507	0.9360	0.8008	0.8712	0.9156	1.0584	0.9078
508	1.4338	1.0246	1.2573	1.4170	1.1280	1.0368
509	1.3080	0.9135	1.0296	1.1881	0.9919	1.0170
510	1.3280	0.6262	0.8712	1.0791	1.0710	0.9090
511	0.8881	0.6732	0.8712	0.9156	0.9765	0.9180
512	0.9095	0.7412	1.0296	1.1187	0.9765	0.9345
513	0.9130	0.6324	0.8712	1.0791	1.0290	0.9030
514	1.4110	0.6510	1.0296	0.9156	1.1322	0.9720
515	1.0764	0.7140	1.2573	0.9156	1.0656	0.9180
516	0.8556	0.7412	1.0296	0.8820	1.1025	0.9612
517	1.0593	0.9048	1.0296	0.9870	0.8928	0.8811
518	1.1009	0.9306	1.2573	0.9156	1.0080	0.9114
519	0.9130	0.6732	1.0648	0.9492	1.0044	0.9720
520	0.8188	0.7140	1.0296	1.0246	1.1520	0.9078
521	1.0764	0.8008	1.0296	1.0791	0.9486	0.9180
522	0.8881	0.6448	1.0296	0.8820	1.0710	0.9180
523	0.8383	0.6138	0.8712	0.7056	1.0044	0.8686
524	1.0890	0.7140	1.2573	1.0920	1.1118	1.0044
525	1.1040	0.8613	1.0296	1.0791	0.9996	1.1700

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
526	0.8383	0.6448	0.8712	0.9306	1.0080	0.9450
527	1.0120	0.8393	1.0296	0.9870	0.9996	0.9720
528	0.8556	0.7072	1.0296	0.8316	1.0290	0.9090
529	0.8556	0.8008	1.0296	0.9156	1.1118	0.9393
530	0.9945	0.6758	1.2573	0.9870	1.2240	0.9078
531	1.0200	0.6758	0.8712	1.0791	1.1340	1.0170
532	0.9844	0.8085	0.8712	0.9306	0.9765	0.9720
533	0.9844	0.6696	1.2573	1.1336	1.2240	0.9612
534	0.9207	0.7344	1.2573	1.1336	1.1520	0.9345
535	0.9095	0.7072	1.0296	1.0296	0.9588	0.9450
536	0.8811	0.7072	1.3959	1.0920	1.1520	0.9486
537	1.0890	0.8393	1.2573	1.0246	1.1322	0.9393
538	0.8560	0.6200	0.8712	0.9156	1.0584	0.9288
539	1.1658	0.9135	1.5246	1.0920	1.1655	1.0395
540	1.0591	0.8787	1.3959	1.0920	1.0656	0.9408
541	0.8811	0.9494	1.2573	1.1336	0.9408	0.9114
542	1.0591	0.9306	1.3959	1.0246	1.0464	0.9504
543	1.0137	0.7623	1.7061	1.0920	1.2240	0.9504
544	0.8811	0.8787	1.2573	0.8820	0.9996	0.9114
545	1.2462	1.0400	1.5246	1.0920	1.1322	1.0098
546	1.1009	0.9306	1.3959	1.2220	1.1118	0.9696
547	0.9701	0.7777	1.3959	1.0920	1.0710	0.9207
548	1.0137	0.8700	1.2573	1.0920	1.0464	0.9408
549	0.7565	0.9048	1.0296	0.8316	1.0290	0.9408
550	0.8188	0.8393	1.2573	0.8820	1.1770	1.1385
551	0.7905	0.9048	1.0296	0.8820	1.1445	0.9702
552	0.8383	0.8008	0.8712	0.8316	0.9408	0.9207
553	0.9711	0.8085	0.8712	1.0296	0.9486	0.9090
554	1.3778	0.8700	1.0648	0.9492	0.9996	0.9408
555	1.3778	0.8008	0.8712	0.9156	0.9996	0.9612
556	0.8383	0.7140	0.8712	0.7056	0.9996	0.9078
557	0.7719	0.6696	1.0296	0.8316	1.1445	0.9486
558	0.8800	0.6758	1.2584	1.0296	1.1655	0.9486
559	0.9360	0.6448	1.0648	1.0296	1.1025	0.8910
560	0.9360	0.6448	1.0648	0.9492	1.1772	0.9090

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
561	0.8881	0.8613	0.8712	0.7056	0.9486	0.9114
562	0.9130	0.8742	0.8712	0.9156	1.0044	0.8910
563	0.9945	0.8742	0.8712	0.7896	1.0152	0.9408
564	0.8881	0.8648	0.8712	0.9156	0.9024	0.8640
565	1.1920	0.7623	0.8712	0.8736	0.8928	0.8722
566	0.8585	0.8004	1.0296	0.8316	0.9486	0.8910
567	0.9711	0.6510	0.8712	0.9306	1.1322	0.9486
568	0.7565	1.0500	0.8712	0.8736	0.9996	0.9702
569	0.7565	0.9306	1.0296	0.8820	1.0710	0.9408
570	0.8881	0.9400	0.8712	0.9156	0.9486	1.0605
571	0.9701	1.0400	1.2573	0.8820	1.1118	1.1270
572	0.8556	0.9776	1.0296	0.8316	1.0464	1.0290
573	0.8881	0.9483	0.8712	0.8736	0.9408	0.9393
574	0.9711	0.9483	0.8712	0.8736	0.9408	1.0044
575	0.8383	0.8085	0.8712	0.9156	1.0710	0.9486
576	0.7387	0.8648	0.8712	0.7896	0.8928	0.9207
577	0.9350	1.0152	0.8712	0.8736	0.9408	0.9765
578	0.9130	0.9483	1.0648	0.9156	0.8928	0.9612
579	0.8383	1.0500	0.8712	0.7896	0.8928	0.9702
580	0.8556	0.9870	0.8712	0.7056	0.9408	0.9114
581	0.7565	1.0100	0.8712	0.7056	0.9024	0.9408
582	0.7905	0.9200	0.8712	0.7896	0.8928	0.9408
583	0.7719	0.9483	0.8712	0.9492	1.1025	0.9486
584	0.8881	0.9776	0.8712	0.8736	0.9996	0.9792
585	0.8188	1.1663	1.0296	0.9306	1.1655	1.0290
586	0.9711	0.9776	1.0296	0.9156	0.9486	0.9702
587	0.8556	1.0400	1.0296	0.8316	1.0080	1.0290
588	0.8881	1.0000	0.8712	0.8736	0.8928	0.9408
589	0.9095	0.8316	0.8712	0.7896	0.9408	0.9612
590	0.8188	1.1235	1.0296	0.8316	0.8928	0.9702
591	0.8004	1.0100	1.0296	0.7056	0.8928	0.9702
592	0.8585	1.0000	0.8712	0.7056	0.9024	0.9408
593	0.8188	0.9900	1.0296	0.7056	0.8928	0.9801
594	0.9207	1.4454	1.0296	0.9306	1.0584	1.3230
595	0.9701	1.3832	1.0296	0.8316	1.1235	1.3230

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
596	0.8811	1.4497	1.0296	0.9306	1.1025	1.2420
597	0.7905	0.9306	1.0296	0.9306	1.0290	1.2420
598	0.8188	1.1128	1.0296	1.0791	1.0584	1.1385
599	0.8811	1.3300	1.0296	0.9306	1.0584	1.3230
600	1.0593	1.3300	1.0296	0.8316	1.1025	1.3230
601	1.0120	1.1556	1.0296	0.9306	1.0710	1.0710
602	1.0137	1.3965	1.7061	0.9156	1.1118	1.3230
603	0.9292	1.0700	0.8712	1.0296	0.9996	1.1270
604	1.0890	1.2369	1.0296	1.0791	1.0710	1.1270
605	1.0593	1.3433	1.2573	0.9306	1.0080	1.1270
606	0.8585	1.0700	0.8712	0.7056	1.0290	1.1385
607	0.9701	1.3965	1.3959	0.9156	1.1655	1.5582
608	0.9292	1.1128	0.8712	0.8316	0.9408	1.0290
609	0.9207	1.3300	1.0296	0.7896	0.9996	1.0350
610	0.9701	1.3433	1.2573	0.8820	1.1772	1.1270
611	1.2753	1.3965	1.2573	0.8820	1.1118	1.3230
612	0.9844	1.3965	1.2584	0.9306	1.1025	1.3230
613	0.8188	0.9200	1.0648	0.8820	1.0290	1.1385
614	0.8188	1.1128	0.8712	0.8316	0.9408	0.9702
615	0.7719	0.9300	0.8712	0.7056	0.8928	0.9801
616	0.8585	1.0700	0.8712	0.7056	0.8928	0.8640
617	0.7719	1.0593	0.8712	0.8736	0.9024	0.9702
618	0.8556	1.1235	0.8712	0.8736	0.9996	1.0290
619	0.7905	0.9776	0.8712	0.8736	0.8928	0.9114
620	0.9095	1.0100	0.8712	0.8736	0.9486	0.9408
621	0.9999	1.0000	1.2573	0.8820	1.0290	0.9450
622	0.9844	0.9306	1.0296	0.8820	0.9765	0.9702
623	0.8556	1.0246	1.0296	0.9870	0.9765	0.9792
624	1.0120	0.9396	1.0296	0.9870	0.9951	0.9720
625	0.9095	0.8742	0.8712	0.7896	1.0152	1.0044
626	0.7719	0.9400	0.8712	0.8736	1.0152	0.9486
627	0.8881	0.8393	0.8712	0.7896	0.9486	1.0044
628	0.8811	1.0500	1.0296	0.8820	1.0290	0.9801
629	0.7565	0.9483	0.8712	0.8736	0.9765	0.9207
630	0.9844	0.8393	1.0296	0.9870	1.0044	0.9486

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
631	0.8556	0.8700	1.0296	0.8820	0.9765	0.9486
632	0.8556	0.9483	1.0296	0.8316	1.0044	0.9612
633	0.9095	0.9135	0.8712	0.7056	0.9486	0.9207
634	0.7565	0.9776	1.0296	0.7896	0.9765	0.9408
635	0.8188	1.0246	1.0296	1.0296	0.9765	0.9504
636	0.8556	1.0400	1.0296	0.8316	0.8928	0.9408
637	0.7905	0.8648	0.8712	0.7056	0.9765	0.8640
638	0.8004	0.9776	1.0296	0.8316	1.0290	0.9801
639	0.9711	1.0100	0.8712	0.9156	1.0152	0.9801
640	0.7719	0.9483	0.8712	0.9156	1.0152	0.9486
641	0.7905	0.9900	0.8712	0.7056	0.9588	0.9702
642	0.9701	1.0500	1.2573	0.9156	1.1025	0.9801
643	0.9999	0.8613	1.0296	0.8820	1.0584	0.9801
644	0.9095	0.9048	0.8712	1.0296	0.9951	0.9792
645	0.7395	1.0593	0.8712	0.9306	1.0058	0.9792
646	0.8188	0.9900	1.0296	0.8316	0.9765	0.9702
647	0.8811	1.0400	1.2573	0.9156	1.1340	1.0290
648	0.8188	0.9776	1.2573	0.9156	1.0290	0.9702
649	0.8188	0.9870	1.0296	0.8820	1.0290	1.0290
650	1.1583	0.9870	1.0296	0.8820	1.0290	0.9612
651	0.7719	0.8742	0.8712	0.9156	0.9765	0.9408
652	0.8585	0.8787	0.8712	0.9492	1.0152	0.9696
653	0.7905	0.9135	0.8712	0.9306	1.0058	0.8811
654	0.9095	0.8008	1.0296	0.8316	1.0044	0.9207
655	0.7565	0.9494	0.8712	0.7056	0.9870	0.9504
656	0.9711	0.9306	0.8712	0.7896	0.9870	0.9408
657	0.9945	0.9776	1.0296	0.8736	0.9765	0.9792
658	0.8585	0.9483	0.8712	0.7056	0.9870	0.9207
659	0.8613	0.9870	1.2573	0.9156	1.1445	1.0395
660	0.9945	0.7344	0.8712	0.8736	0.9765	0.9345
661	0.8585	0.8742	1.0296	0.7056	0.9765	0.9408
662	0.7395	1.0246	0.8712	0.7056	0.9765	1.0044
663	0.8383	0.8085	0.8712	1.0296	1.0058	0.8811
664	0.8556	0.9483	1.2573	0.8820	1.0584	0.9504
665	0.9711	0.7412	0.8712	0.7896	0.9765	0.9612

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
666	0.8383	0.8008	0.8712	0.7056	0.9486	0.9612
667	0.8613	1.0400	1.2573	0.9156	1.1340	1.1270
668	0.8585	0.8787	0.8712	0.7056	1.0152	0.9207
669	0.9999	0.9135	1.0296	0.8820	1.0044	0.9393
670	0.9095	0.7623	0.8712	0.8736	0.9765	0.9078
671	0.9483	1.0246	1.0296	0.9156	1.1340	1.0395
672	0.8188	0.9483	1.2573	0.8820	1.0290	0.9999
673	0.9292	0.9483	1.0296	0.8820	1.0290	1.0692
674	0.9960	0.9300	0.8712	0.8736	0.9588	0.9702
675	0.7905	0.9900	0.8712	0.7896	0.9765	0.9408
676	0.8881	0.9135	0.8712	0.8736	0.9588	0.9393
677	1.0353	1.0400	1.3959	1.0920	1.1988	1.3365
678	0.9207	0.9900	1.2573	0.9156	1.1025	1.0290
679	1.0353	1.3832	1.7061	1.0920	1.1772	1.3230
680	0.9701	1.3167	1.2573	0.9156	1.1340	1.3230
681	0.8613	1.0807	1.0296	0.8820	1.1025	1.0350
682	0.8188	0.9844	1.0296	0.8820	1.0290	1.0350
683	0.8585	0.9951	0.8712	1.0296	1.0290	1.0350
684	1.1658	1.1235	1.3959	1.0920	1.2840	1.6218
685	0.8188	1.0807	1.0296	0.8316	0.9486	0.9450
686	0.7565	1.0700	0.8712	0.8316	0.9765	0.8910
687	0.8188	1.0593	0.8712	0.7056	0.9765	1.0290
688	0.7565	1.0000	0.8712	0.7056	0.9765	1.1385
689	0.8811	1.0500	1.2573	0.9156	1.1772	1.1270
690	1.4110	1.1235	0.8712	0.8736	0.9486	1.0395
691	0.9130	1.0593	0.8712	0.7896	0.9996	1.0605
692	0.9945	0.8316	0.8712	0.7056	0.9996	0.9078
693	0.7719	0.7140	0.8712	0.8736	0.9996	0.9180
694	1.0200	0.9396	0.8712	0.7896	1.1025	0.9696
695	0.8556	0.9776	1.0296	0.9306	0.9486	0.9696
696	0.9945	1.0500	0.8712	0.7896	0.9486	0.9702
697	0.7565	0.9483	0.8712	0.8316	0.9486	0.9207
698	0.9350	1.0500	1.0296	0.7896	0.9996	0.9792
699	0.9945	1.1128	0.8712	0.7896	0.9996	0.9504
700	0.9350	1.0807	0.8712	0.8736	0.9996	0.9450

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
701	0.7719	0.8085	0.8712	0.7896	0.9765	0.9207
702	0.8383	0.9483	0.8712	0.8736	0.8928	0.9090
703	0.8585	0.8700	0.8712	0.8736	0.9486	0.9393
704	0.9095	0.8085	0.8712	0.7896	0.9486	0.9393
705	1.0764	1.0900	1.2584	0.8736	1.1025	0.8910
706	0.9095	0.8393	1.0296	0.8316	0.9765	0.8989
707	0.9844	1.0246	1.0296	0.9156	1.0290	0.9207
708	0.7719	0.8787	0.8712	0.7896	0.9486	0.8370
709	0.9095	0.8085	1.2573	0.8316	1.1988	0.9801
710	0.7565	1.0246	0.8712	0.8736	0.8928	0.9207
711	0.7395	0.9870	0.8712	0.7056	0.9765	0.9207
712	0.8585	0.9776	1.2573	0.8820	1.1877	1.1270
713	0.7387	0.9776	0.8712	0.7896	0.9408	0.9696
714	0.8004	1.0400	1.0296	0.7056	0.8928	0.9801
715	0.8585	0.8393	0.8712	0.8736	0.8928	0.9078
716	0.9945	0.8700	1.0296	0.8820	1.1445	0.9702
717	0.9711	0.5766	0.8712	0.8736	1.0290	0.8772
718	0.7440	0.6732	0.8712	0.7896	0.9996	0.8989
719	0.8585	0.8393	0.8712	0.8736	0.8928	0.9078
720	0.7387	0.8613	0.8712	0.9492	0.9765	0.8722
721	0.7905	1.0500	0.8712	0.8736	0.8928	0.9696
722	0.8613	1.1663	1.0296	0.8316	1.0710	1.0395
723	0.8613	1.0400	1.0296	0.8820	1.0080	0.9801
724	0.8811	1.1235	1.0296	0.8820	1.0080	1.1385
725	0.7905	0.9776	0.8712	0.9306	0.9486	0.9114
726	0.8811	0.9900	1.2573	0.8820	0.9408	1.0290
727	0.7905	1.0500	0.8712	0.8736	0.8928	0.9702
728	1.0591	1.1128	1.3959	1.0920	1.0486	1.1270
729	1.0137	0.9306	1.5367	1.0920	0.9951	1.0290
730	0.9701	0.9306	1.0296	0.9156	0.9951	0.9408
731	0.9701	0.9135	1.3959	1.0920	1.0486	1.0395
732	1.0137	0.9048	1.2573	0.9156	1.0509	0.9504
733	1.0353	1.0700	1.2573	1.0920	0.9951	0.9999
734	0.8188	0.8393	1.0296	0.8820	0.9951	0.9393
735	0.9999	0.9048	1.2573	1.0246	1.0622	0.9801

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
736	1.0764	0.7412	1.0296	0.9870	1.0058	0.9180
737	0.9711	0.6138	0.8712	0.7896	1.0058	0.8686
738	1.1920	0.6758	0.8712	0.9492	0.9951	0.9720
739	0.9960	0.6510	0.8712	0.8736	0.9951	0.9450
740	0.9207	0.9396	1.2573	0.9156	1.0486	1.0044
741	0.8800	0.6758	1.0648	0.9156	0.9951	0.9030
742	0.9292	0.8393	1.0296	0.9870	1.0622	0.9612
743	0.9844	0.8085	1.0296	0.9870	1.0058	0.8989
744	0.9945	0.8008	1.0296	0.9306	1.0058	0.8910
745	0.8800	0.6448	0.8712	0.9492	1.0044	0.9720
746	0.9960	0.7412	1.0648	0.9156	1.0044	0.9720
747	0.7440	0.6200	0.8712	0.8736	1.0152	0.9288
748	1.0200	0.6758	1.0296	1.0791	1.0058	0.9450
749	1.3280	0.6200	0.8712	0.9492	0.9951	0.9030
750	1.3778	0.6758	0.8712	0.9492	0.9951	0.9345
751	0.8556	0.8008	1.0296	0.9870	0.9765	0.9207
752	1.1040	0.9483	1.0296	0.8820	1.0584	1.0044
753	1.0764	0.8393	1.0296	0.9870	0.9951	0.9612
754	0.9207	0.9135	1.2573	0.9156	1.0584	0.9504
755	0.9360	0.6758	0.8712	0.7896	1.0290	0.9450
756	0.9292	0.8393	1.0296	0.8820	1.1025	0.8989
757	0.9095	0.7412	1.0296	0.9156	1.1340	0.9393
758	0.9207	0.7344	1.2573	0.8820	1.0290	0.9612
759	0.8800	0.6200	0.8712	0.7896	1.0044	0.9030
760	0.9945	0.8393	0.8712	0.8316	0.9486	0.9612
761	0.9130	0.6758	0.8712	0.9156	0.9765	0.9720
762	0.9095	0.7412	0.8712	1.0296	1.0290	0.9720
763	0.9844	0.8393	1.0296	1.0920	1.0152	0.9720
764	0.9999	0.9135	1.0296	0.9156	1.0290	0.9207
765	0.9844	0.7412	1.0296	0.9306	1.0486	1.0057
766	0.9360	0.6262	0.8712	0.9156	1.0486	0.9030
767	0.8080	0.6262	0.8712	0.8736	0.9951	0.9030
768	1.1990	0.8613	1.7061	0.9156	1.1025	0.9408
769	0.9960	0.7072	0.8712	0.8736	1.0044	0.9486
770	1.0137	0.9776	1.2573	0.8820	1.0290	0.9408

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
771	1.0137	0.9483	1.2573	0.9156	1.1025	0.9504
772	1.0120	0.9483	1.0296	1.0920	1.0290	0.9078
773	0.9999	0.8393	1.0296	1.1445	1.1340	1.0368
774	1.1920	0.6448	0.8712	0.9492	0.9951	0.9612
775	1.5272	0.8393	1.0296	0.8820	1.0152	0.9090
776	1.1583	0.9483	1.0296	0.9156	1.1025	0.9696
777	1.0593	0.9483	1.3416	0.9156	0.9951	0.9393
778	0.8556	0.7072	1.0296	0.8820	1.0044	0.9612
779	0.8383	0.7072	0.8712	0.8736	1.0584	0.8910
780	0.9999	0.9483	1.0296	0.8820	0.9951	0.9207
781	0.9292	0.9048	1.0296	1.0296	1.0058	0.9696
782	0.9844	0.8085	1.3959	0.8820	1.0710	0.8989
783	0.8800	0.6138	0.8712	0.7896	1.0584	0.9720
784	0.8188	1.0152	1.0296	0.8316	0.9996	1.0098
785	0.8556	0.9306	0.8712	0.8316	0.9408	0.9792
786	0.8004	1.0152	1.2573	0.8820	1.1118	1.0605
787	0.9600	0.6510	0.8712	0.8736	0.9996	0.9612
788	0.7440	0.6510	0.8712	0.7896	0.9996	0.9720
789	0.8560	0.6732	0.8712	0.7896	1.1025	1.0057
790	0.9945	0.7412	0.8712	1.1187	1.0584	0.9792
791	0.9960	0.6758	0.8712	0.9492	1.0584	0.9078
792	0.7120	0.7344	0.8712	0.7896	1.0290	0.9180
793	0.8560	0.6448	0.8712	0.8736	1.0584	1.0170
794	0.9711	0.7072	0.8712	0.8736	1.1025	0.9612
795	0.8383	0.6696	0.8712	0.8736	0.9996	0.9450
796	0.8585	0.9483	0.8712	0.7056	0.8928	0.8989
797	0.7120	0.6138	0.8712	0.8736	0.9996	0.9078
798	0.9945	0.6758	0.8712	0.8736	1.0044	0.9612
799	0.7719	0.9483	0.8712	0.7056	0.9486	0.8989
800	0.7440	0.6696	0.8712	0.7896	1.0710	0.9030
801	0.7565	0.9483	0.8712	0.8736	1.0080	0.9486
802	0.8383	0.8316	0.8712	0.7896	0.9996	1.0044
803	0.9600	0.6758	0.8712	0.9156	1.0044	0.9450
804	0.9360	0.6758	0.8712	0.9156	1.0152	0.9090
805	0.7387	0.6868	0.8712	0.7896	1.0290	0.9720

State: CALIFORNIA
Line of Business: AUTO
Effective: DECEMBER 28, 2017 (NEW BUSINESS)
DECEMBER 28, 2017 (RENEWAL BUSINESS)
Companies: UNITED SERVICES AUTOMOBILE ASSOCIATION
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
806	0.9130	0.7412	0.8712	0.8736	1.0152	0.8811
807	0.7440	0.6758	0.8712	0.8736	1.0290	0.9288
808	0.9960	0.6696	0.8712	0.9492	1.0584	0.9345
809	0.8560	0.6696	0.8712	0.7896	1.1025	1.0057
810	0.8881	0.6696	0.8712	0.7896	1.0044	0.9720
811	0.8383	0.6758	0.8712	0.7896	1.0044	0.9720
812	0.6960	0.6510	0.8712	0.7896	1.0290	0.9345
813	0.7120	0.6758	0.8712	0.7896	1.0710	0.9450
814	0.7440	0.6448	1.1352	0.7896	1.0584	1.2090
815	0.8560	0.6758	0.8712	0.7896	1.0584	1.1570
816	0.7440	0.7072	0.8712	0.7896	1.0152	0.9090
817	0.7120	0.6324	0.8712	0.7056	0.9951	0.9180
818	0.7440	0.6448	0.8712	0.7896	1.0486	1.1570
819	0.8800	0.6448	0.8712	0.9306	0.9951	0.9288
820	0.6960	0.6800	0.8712	0.7056	0.9951	0.9720
821	0.6960	0.6448	0.8712	0.7056	0.9951	0.9090
822	0.7120	0.6758	0.8712	0.8736	1.0584	1.1570
823	0.9945	0.8393	1.0296	0.7896	1.0486	1.3650
824	0.7387	0.6732	0.8712	0.7056	0.9951	0.9612
825	0.7387	0.7140	0.8712	0.7056	1.0044	0.9612
826	0.7719	0.6800	0.8712	0.7896	1.0152	0.9090
827	0.7395	0.8393	0.8712	0.7056	1.0058	0.9612
828	0.7440	0.5766	0.8712	0.7056	0.9951	0.9720
829	0.8560	0.6510	1.0648	0.7056	1.0486	1.1700
830	0.8383	0.6696	0.8712	0.9492	0.9951	0.9765
831	0.9711	0.7412	0.8712	0.7896	1.0584	1.0080
832	0.8080	0.6138	0.8712	0.7896	1.0058	0.9450
833	0.8080	0.6138	0.8712	0.8736	0.9951	0.9450
834	0.7221	0.6758	1.1352	0.7056	1.0486	1.0057
835	0.7440	0.6262	0.8712	0.7896	1.0058	0.9090
836	0.7565	0.7412	0.8712	0.8736	1.1340	1.2090
837	0.9350	0.8085	0.8712	0.9492	1.1844	0.9180
838	0.9711	0.7623	0.8712	0.9492	1.0622	0.8989
839	1.0593	0.9776	1.0296	1.0246	1.0058	0.9702
840	1.2753	0.9494	1.0296	1.1445	1.0058	0.9702

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
841	1.1009	1.0000	1.2573	1.1336	1.0058	0.9504
842	0.9292	0.7412	1.0296	0.9870	1.0058	0.9090
843	0.8881	0.6758	0.8712	0.9492	1.0058	0.9720
844	1.0890	0.9483	1.2573	0.9870	1.0058	0.9792
845	0.8585	0.8700	0.8712	0.8736	1.0058	0.8722
846	0.9095	0.8613	0.8712	0.8736	1.0058	0.8722
847	0.9960	0.7412	1.0296	0.9156	1.0058	0.9090
848	0.7905	0.7412	0.8712	1.0296	1.0622	0.9180
849	1.1009	1.0900	1.2573	1.1336	1.0152	0.9504
850	1.2665	0.8316	1.1352	0.9492	1.0622	0.9180
851	0.9999	0.9306	1.0296	1.0920	1.0058	0.9696
852	1.1009	0.8393	1.5367	1.1881	1.0152	0.8989
853	0.9960	0.6510	1.0296	0.9306	1.0058	0.9078
854	1.0890	0.9494	1.0296	1.1865	1.0622	0.9696
855	1.3778	0.7140	0.8712	0.9492	1.0058	0.9450
856	0.9292	0.8787	0.8712	1.1187	1.0058	0.9114
857	0.9360	0.6696	0.8712	0.8736	1.0622	0.9288
858	0.9844	0.8085	1.0296	1.0296	1.0058	0.9612
859	0.8881	0.7412	0.8712	0.9492	1.0058	0.9612
860	1.0200	0.7344	0.8712	0.9492	1.0058	0.9720
861	0.9960	0.6758	0.8712	1.0296	1.0622	0.9612
862	0.8188	0.7140	1.0296	1.0296	1.0152	0.9612
863	0.8383	0.6448	1.0296	1.0296	1.0058	0.8910
864	0.9945	0.8700	0.8712	1.0791	1.0058	0.9393
865	1.0764	0.9396	1.0648	0.9492	1.0058	0.9720
866	0.9350	0.8613	0.8712	0.9492	1.0058	1.0044
867	1.2462	1.0593	1.7061	1.0920	1.0486	1.0605
868	0.8881	0.6732	0.8712	0.8736	1.0058	0.9090
869	1.1009	1.0246	1.2573	1.1336	1.0058	0.9504
870	0.9130	0.8008	0.8712	0.9492	1.0058	0.8772
871	1.2462	1.1235	1.2573	1.3520	1.0584	0.9999
872	1.0593	0.8742	1.0296	1.0791	1.0058	0.9114
873	0.9999	0.9400	1.0296	1.1865	1.0152	0.8989
874	0.9960	0.6758	0.8712	0.9156	1.0622	0.9180
875	0.9600	0.6758	0.8712	0.9156	0.9951	0.9288

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
876	1.4110	0.8393	0.8712	0.9492	1.0622	0.9078
877	1.0591	0.9306	1.2573	0.9156	1.0058	0.9801
878	0.9350	0.8085	0.8712	0.9492	1.0058	0.9612
879	1.3923	1.0152	1.2573	1.2220	1.0584	1.0044
880	1.0593	1.0246	1.0296	1.1187	1.0058	0.8989
881	0.9292	0.8393	0.8712	1.0791	1.0058	0.9078
882	0.9711	0.8393	0.8712	0.9492	1.0058	0.9078
883	1.3778	0.6510	0.8712	0.9156	1.0622	0.9450
884	1.3280	0.7412	0.8712	0.9156	1.0058	0.9078
885	0.9844	0.8613	1.0296	0.9306	1.0622	0.8910
886	0.9095	0.8091	0.8712	0.7896	1.0058	0.9393
887	0.9130	0.6758	0.8712	0.9492	1.0622	0.9720
888	0.9350	0.6510	0.8712	1.0791	1.0058	0.9720
889	0.9207	0.9135	1.0296	1.0920	1.0058	0.9207
890	1.0120	0.8316	1.0296	1.1445	1.0058	0.9450
891	1.0200	0.7412	0.8712	0.9492	1.0058	0.9078
892	0.7905	0.7412	1.0296	1.0296	1.0058	0.9180
893	0.8585	0.8393	0.8712	0.9156	1.0622	0.8811
894	0.9960	0.7412	0.8712	0.9492	1.0622	0.9720
895	0.8383	0.7412	0.8712	0.9492	1.1844	0.9720
896	0.8881	0.6868	0.8712	0.9492	1.1844	0.9345
897	0.8881	0.7072	1.0296	0.9492	1.1844	0.9450
898	0.9130	0.8393	1.1352	0.9492	1.0044	1.0044
899	1.1040	0.9870	1.1352	0.9492	1.0044	0.9612
900	1.1583	0.9870	1.2573	1.1445	1.0622	1.0368
901	0.8585	0.8091	0.8712	0.9492	1.0058	0.9078
902	1.0593	1.0000	1.0296	1.1865	1.0058	0.9999
903	0.9999	0.8700	1.0296	0.9870	1.0058	0.9702
904	0.9095	0.8613	0.8712	1.1187	1.0622	1.0368
905	1.1663	1.0807	1.2573	1.0246	1.0622	1.1385
906	1.0137	1.1128	1.0296	1.1336	1.0058	1.0395
907	1.1009	1.0500	1.0296	1.1336	1.0058	0.9999
908	1.1067	1.1663	1.0296	1.1336	1.0058	0.9702
909	1.0137	1.0400	1.2573	1.0920	0.9951	1.0290
910	1.2733	1.0400	1.0296	1.0246	1.0058	0.9504

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
911	1.2462	1.0400	1.5246	1.0920	1.0486	1.1270
912	1.0137	0.9900	1.2573	1.1336	1.0058	0.9408
913	1.1926	1.0500	1.3959	1.0920	1.0486	1.0395
914	1.0137	0.9870	1.2573	1.1336	0.9951	0.9408
915	1.0137	1.0400	1.2573	1.2220	0.9951	0.9999
916	1.0593	0.9494	1.0296	1.1336	1.0622	0.9999
917	0.9999	0.8787	1.0296	1.0920	1.0058	0.9207
918	1.0120	0.7777	1.0296	1.1445	1.0509	0.9078
919	1.0890	1.0000	0.8712	1.0920	1.0058	0.9999
920	0.9292	0.8008	1.0296	1.0296	1.1844	0.9792
921	0.8881	0.7140	0.8712	0.9156	1.0622	0.9090
922	0.7719	0.6448	0.8712	0.8736	1.0509	0.9180
923	0.9130	0.6732	0.8712	0.9492	1.0622	0.9078
924	0.9844	0.7140	1.0296	1.0791	1.0058	0.8910
925	0.9095	0.6732	1.0296	0.9306	1.0622	0.8910
926	0.9945	0.6732	1.0296	1.0296	1.0622	0.8989
927	0.9130	0.6732	0.8712	0.9156	1.0622	0.9345
928	0.8188	0.8787	1.0296	1.0296	1.0058	0.9114
929	0.8556	0.7777	1.0296	0.9306	1.0058	0.8722
930	1.3280	0.6262	0.8712	1.0791	1.0058	0.9090
931	0.8188	0.8085	1.0296	1.0791	1.1718	0.9612
932	0.9711	0.6262	0.8712	0.9156	1.0058	0.9180
933	0.7905	0.6732	1.0296	1.0791	1.0058	0.8514
934	0.8881	0.6510	0.8712	1.0296	1.0622	0.9180
935	0.9945	0.6800	1.0296	1.1445	0.9951	0.9612
936	0.7905	0.6732	1.0296	1.0296	1.0058	0.9090
937	0.8560	0.6758	0.8712	0.9156	1.0622	0.9180
938	0.8800	0.7140	0.8712	0.9492	1.0622	0.9090
939	1.3280	0.6138	0.8712	0.8736	0.9951	0.9030
940	0.8188	0.6868	1.0296	0.9306	1.0058	0.9114
941	1.0764	0.8008	1.2573	1.1445	1.0058	0.9114
942	0.9095	0.6868	1.0296	1.0791	1.0058	0.8722
943	0.9360	0.5704	0.8712	0.8736	1.0622	0.8811
944	0.8811	0.8008	1.2573	0.9870	1.0622	0.9504
945	0.9350	0.9135	0.8712	1.0791	1.1844	0.9696

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
946	0.9350	0.6732	1.3416	1.0791	1.0058	0.8820
947	0.8881	0.6696	0.8712	1.0791	1.0622	0.9090
948	0.9600	0.6138	0.8712	1.1187	1.0058	0.8910
949	0.8800	0.6138	0.8712	0.9156	1.0622	0.8514
950	1.0120	0.7140	1.0296	1.0791	1.1844	0.9450
951	0.8800	0.6200	0.8712	0.9492	1.0058	0.9180
952	1.3280	0.6138	0.8712	0.9492	0.9951	0.8772
953	0.8800	0.6758	0.8712	0.9156	0.9951	0.9288
954	0.9960	0.6138	0.8712	1.1187	1.0509	0.9612
955	0.9095	0.7700	1.0296	1.0791	1.0152	0.8820
956	0.9711	0.7412	0.8712	0.8736	1.1235	0.9180
957	0.9945	0.6324	0.8712	1.0791	1.0058	0.8820
958	0.8383	0.6262	0.8712	1.0791	1.0058	0.8686
959	0.8080	0.6448	0.8712	0.8736	0.9951	0.9720
960	0.8560	0.6262	0.8712	0.9156	0.9951	0.9288
961	0.9360	0.6200	0.8712	0.9156	1.0486	0.9718
962	0.9600	0.6200	0.8712	0.8736	1.0486	0.9030
963	0.9711	0.6138	1.0648	0.9156	1.0622	0.9288
964	0.9600	0.6262	0.8712	0.9156	1.0044	0.9288
965	0.9360	0.6138	0.8712	0.9156	0.9951	0.9345
966	0.9600	0.5766	0.8712	0.8736	1.0058	0.8772
967	0.9360	0.5704	0.8712	0.9156	1.0058	0.8514
968	0.8800	0.6138	0.8712	0.9156	0.9951	0.9030
969	0.8080	0.5766	0.8712	0.9156	1.0509	0.8686
970	0.9600	0.6200	0.8712	0.9156	1.0058	0.8772
971	0.9130	0.5766	1.0648	0.9492	1.1025	0.9030
972	0.9360	0.6262	0.8712	0.9156	0.9870	0.8910
973	0.8800	0.6138	0.8712	0.9156	0.9951	0.8686
974	0.9360	0.5766	0.8712	0.9156	1.0152	0.8686
975	0.9360	0.6200	0.8712	0.8736	0.9951	0.9612
976	0.9600	0.6262	0.8712	0.9156	1.0622	0.8514
977	0.9600	0.6448	0.8712	0.9156	1.1235	0.9718
978	0.9360	0.6200	0.8712	0.8736	1.0044	0.9288
979	0.9360	0.5766	0.8712	0.8736	0.9951	0.9288
980	0.9360	0.6200	0.8712	0.8736	1.0058	0.8428

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

PURE PREMIUM BAND

Garrison

<u>Band Code</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>
981	0.8800	0.5766	0.8712	0.9156	0.9951	0.9450
982	0.8800	0.5766	0.8712	0.9156	1.0509	0.8686
983	0.9360	0.5766	0.8712	0.8736	1.0486	0.8772
984	0.8800	0.6138	0.8712	0.9156	1.1235	0.9288
985	0.8800	0.6510	0.8712	0.9492	1.0058	0.8772
986	0.8881	0.8316	0.8712	0.9492	1.0058	0.9612
987	1.1920	0.6510	0.8712	0.9492	1.1235	0.9450
988	1.1920	0.6448	0.8712	0.9492	1.1235	0.9288
989	0.8800	0.6138	0.8712	0.8736	1.1235	0.9450
990	0.9600	0.5704	0.8712	0.9156	0.9951	0.9288
991	1.3280	0.6758	0.8712	0.9156	1.1235	0.9720
992	0.9600	0.6138	0.8712	0.8736	1.1074	0.9720
993	0.9600	0.6138	0.8712	0.7896	1.1074	0.9090
994	1.1920	0.6200	0.8712	0.9492	1.1235	0.9720
995	1.1920	0.6138	0.8712	0.9156	0.9951	0.8772
996	0.8800	0.8393	0.8712	0.9492	1.0058	0.9486
997	0.8800	0.8393	0.8712	0.9492	1.0058	0.8989
998	0.9350	0.9483	0.8712	0.9492	1.0044	0.9078
999	0.9600	0.8393	0.8712	0.9492	1.0152	0.9612

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **MAY 10, 2012 (NEW BUSINESS)**
MAY 10, 2012 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

INCREASED LIMITS

BI Increased Limit Factors

<u>Per Person</u>	<u>Per Accident</u>	<u>USAA</u>	<u>CIC</u>	<u>GIC</u>	<u>Garrison</u>
15,000	30,000	1.00	1.00	1.00	1.00
20,000	40,000	1.10	1.10	1.09	1.10
25,000	50,000	1.19	1.19	1.16	1.19
30,000	60,000	1.24	1.24	1.24	1.24
50,000	100,000	1.42	1.42	1.30	1.42
100,000	200,000	1.62	1.62	1.44	1.62
100,000	300,000	1.64	1.64	1.47	1.64
300,000	500,000	1.93	1.93	1.64	1.93
500,000	500,000	2.05	2.05	1.68	2.05
500,000	1,000,000	2.08	2.08	1.71	2.08
1,000,000	1,000,000	2.33	2.33	1.85	2.33

PD Increased Limit Factors

<u>Limit</u>	<u>USAA</u>	<u>CIC</u>	<u>GIC</u>	<u>Garrison</u>
5,000	1.00	1.00	1.00	1.00
10,000	1.05	1.05	1.05	1.05
25,000	1.08	1.08	1.08	1.08
50,000	1.13	1.13	1.11	1.13
100,000	1.18	1.18	1.13	1.18
300,000	1.29	1.29	1.21	1.29
500,000	1.34	1.34	1.29	1.34

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **MAY 10, 2012 (NEW BUSINESS)**
MAY 10, 2012 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

INCREASED LIMITS

MP Increased Limit Factors

<u>Limit</u>	<u>USAA</u>	<u>CIC</u>	<u>GIC</u>	<u>Garrison</u>
500	1.00	1.00	1.00	1.00
1,000	1.19	1.19	1.19	1.19
2,000	1.31	1.31	1.31	1.31
5,000	1.68	1.68	1.68	1.68
10,000	2.05	2.05	2.05	2.05
25,000	3.16	3.16	3.16	3.16
50,000	3.99	3.99	3.99	3.99
75,000	4.61	4.61	4.61	4.61
100,000	4.92	4.92	4.92	4.92

UMUIMBI Increased Limit Factors

<u>Per Person</u>	<u>Per Accident</u>	<u>USAA</u>	<u>CIC</u>	<u>GIC</u>	<u>Garrison</u>
15,000	30,000	1.00	1.00	1.00	1.00
20,000	40,000	1.44	1.44	1.44	1.44
25,000	50,000	1.57	1.57	1.57	1.57
30,000	60,000	1.70	1.70	1.70	1.70
50,000	100,000	1.94	1.94	1.94	1.94
100,000	200,000	2.34	2.34	2.34	2.34
100,000	300,000	2.37	2.37	2.37	2.37
300,000	500,000	2.67	2.67	2.67	2.67
500,000	500,000	2.82	2.82	2.82	2.82
500,000	1,000,000	2.86	2.86	2.86	2.86
1,000,000	1,000,000	3.20	3.20	3.20	3.20

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

EXTENDED NON-OWNER AUTO RATES

Extended Non-Owner Auto MP Rates

<u>Limit</u>	<u>USAA</u>	<u>CIC</u>	<u>GIC</u>	<u>Garrison</u>
1,000	4.00	4.48	6.72	4.48
2,000	5.00	5.60	8.40	5.60
5,000	7.00	7.83	11.76	7.83
10,000	14.00	15.67	23.52	15.67
25,000	25.00	27.98	42.00	27.98
50,000	35.00	39.17	58.80	39.17
75,000	43.00	48.12	72.24	48.12
100,000	47.00	52.59	78.96	52.59

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DEDUCTIBLE RELATIVITIES

**CP Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1997 & Prior</u>									
	<u>0</u>	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>	
1	2.18	1.88	1.67	1.53	1.40	1.30	1.22	1.00	0.70	
2	2.18	1.88	1.67	1.53	1.40	1.30	1.22	1.00	0.70	
3	2.18	1.88	1.67	1.53	1.40	1.30	1.22	1.00	0.70	
4	2.18	1.88	1.67	1.53	1.40	1.30	1.22	1.00	0.70	
5	2.18	1.88	1.67	1.53	1.40	1.30	1.22	1.00	0.70	
6	2.18	1.88	1.67	1.53	1.40	1.30	1.22	1.00	0.70	
7	2.06	1.79	1.59	1.48	1.35	1.27	1.19	1.00	0.70	
8	2.06	1.79	1.59	1.48	1.35	1.27	1.19	1.00	0.70	
9	2.06	1.79	1.59	1.48	1.35	1.27	1.19	1.00	0.70	
10	2.06	1.79	1.59	1.48	1.35	1.27	1.19	1.00	0.70	
11	2.06	1.79	1.59	1.48	1.35	1.27	1.19	1.00	0.70	
12	2.06	1.79	1.59	1.48	1.35	1.27	1.19	1.00	0.70	
13	2.06	1.79	1.59	1.48	1.35	1.27	1.19	1.00	0.70	
14	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
15	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
16	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
17	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
18	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
19	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
20	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
21	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
22	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
23	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
24	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
25	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
26	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
27	1.82	1.65	1.47	1.40	1.26	1.19	1.16	1.00	0.76	
Misc Vehicles	2.18	1.88	1.67	1.53	1.40	1.30	1.22	1.00	0.70	

State: **CALIFORNIA**
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USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

**CP Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>								
	<u>0</u>	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
301	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
302	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
303	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
304	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
305	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
306	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
307	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
308	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
309	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
310	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
311	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
312	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
313	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
314	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
315	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
316	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
317	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
318	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
319	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
320	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
321	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
322	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
323	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039
324	2.4954	2.0122	1.8088	1.6276	1.4682	1.3355	1.2203	1.0000	0.7046
325	2.4954	2.0122	1.8088	1.6276	1.4682	1.3355	1.2203	1.0000	0.7046
326	2.4954	2.0122	1.8088	1.6276	1.4682	1.3355	1.2203	1.0000	0.7046
327	2.4954	2.0122	1.8088	1.6276	1.4682	1.3355	1.2203	1.0000	0.7046
328	2.4954	2.0122	1.8088	1.6276	1.4682	1.3355	1.2203	1.0000	0.7046
329	2.4853	2.0060	1.8042	1.6244	1.4661	1.3342	1.2198	1.0000	0.7053
330	2.4853	2.0060	1.8042	1.6244	1.4661	1.3342	1.2198	1.0000	0.7053
331	2.4853	2.0060	1.8042	1.6244	1.4661	1.3342	1.2198	1.0000	0.7053
332	2.4794	2.0024	1.8016	1.6224	1.4648	1.3335	1.2194	1.0000	0.7057
333	2.4794	2.0024	1.8016	1.6224	1.4648	1.3335	1.2194	1.0000	0.7057
334	2.4794	2.0024	1.8016	1.6224	1.4648	1.3335	1.2194	1.0000	0.7057
335	2.4726	1.9983	1.7985	1.6203	1.4634	1.3327	1.2191	1.0000	0.7061
336	2.4726	1.9983	1.7985	1.6203	1.4634	1.3327	1.2191	1.0000	0.7061
337	2.4726	1.9983	1.7985	1.6203	1.4634	1.3327	1.2191	1.0000	0.7061
338	2.4665	1.9945	1.7957	1.6183	1.4621	1.3319	1.2187	1.0000	0.7066
339	2.4665	1.9945	1.7957	1.6183	1.4621	1.3319	1.2187	1.0000	0.7066
340	2.4598	1.9904	1.7926	1.6161	1.4607	1.3311	1.2183	1.0000	0.7070

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: DECEMBER 28, 2017 (NEW BUSINESS)
 DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

**CP Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>								
	<u>0</u>	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
341	2.4598	1.9904	1.7926	1.6161	1.4607	1.3311	1.2183	1.0000	0.7070
342	2.4598	1.9904	1.7926	1.6161	1.4607	1.3311	1.2183	1.0000	0.7070
343	2.4513	1.9852	1.7888	1.6134	1.4588	1.3301	1.2178	1.0000	0.7076
344	2.4513	1.9852	1.7888	1.6134	1.4588	1.3301	1.2178	1.0000	0.7076
345	2.4435	1.9805	1.7853	1.6109	1.4572	1.3291	1.2174	1.0000	0.7082
346	2.4435	1.9805	1.7853	1.6109	1.4572	1.3291	1.2174	1.0000	0.7082
347	2.4435	1.9805	1.7853	1.6109	1.4572	1.3291	1.2174	1.0000	0.7082
348	2.4369	1.9764	1.7822	1.6087	1.4558	1.3283	1.2170	1.0000	0.7086
349	2.4369	1.9764	1.7822	1.6087	1.4558	1.3283	1.2170	1.0000	0.7086
350	2.4315	1.9731	1.7798	1.6069	1.4546	1.3276	1.2167	1.0000	0.7090
351	2.4315	1.9731	1.7798	1.6069	1.4546	1.3276	1.2167	1.0000	0.7090
352	2.4259	1.9697	1.7772	1.6051	1.4534	1.3270	1.2164	1.0000	0.7094
353	2.4191	1.9655	1.7741	1.6029	1.4519	1.3261	1.2160	1.0000	0.7099
354	2.4191	1.9655	1.7741	1.6029	1.4519	1.3261	1.2160	1.0000	0.7099
355	2.4191	1.9655	1.7741	1.6029	1.4519	1.3261	1.2160	1.0000	0.7099
356	2.4101	1.9600	1.7700	1.6000	1.4500	1.3250	1.2155	1.0000	0.7105
357	2.4101	1.9600	1.7700	1.6000	1.4500	1.3250	1.2155	1.0000	0.7105
358	2.4018	1.9549	1.7662	1.5973	1.4482	1.3240	1.2150	1.0000	0.7111
359	2.4018	1.9549	1.7662	1.5973	1.4482	1.3240	1.2150	1.0000	0.7111
360	2.3940	1.9501	1.7626	1.5947	1.4465	1.3230	1.2145	1.0000	0.7117
361	2.3940	1.9501	1.7626	1.5947	1.4465	1.3230	1.2145	1.0000	0.7117
362	2.3879	1.9463	1.7598	1.5927	1.4452	1.3222	1.2142	1.0000	0.7121
363	2.3879	1.9463	1.7598	1.5927	1.4452	1.3222	1.2142	1.0000	0.7121
364	2.3824	1.9430	1.7573	1.5910	1.4440	1.3215	1.2139	1.0000	0.7125
365	2.3824	1.9430	1.7573	1.5910	1.4440	1.3215	1.2139	1.0000	0.7125
366	2.3744	1.9380	1.7536	1.5883	1.4423	1.3205	1.2134	1.0000	0.7131
367	2.3679	1.9340	1.7507	1.5862	1.4409	1.3197	1.2130	1.0000	0.7136
368	2.3679	1.9340	1.7507	1.5862	1.4409	1.3197	1.2130	1.0000	0.7136
369	2.3594	1.9288	1.7467	1.5834	1.4390	1.3186	1.2125	1.0000	0.7142
370	2.3594	1.9288	1.7467	1.5834	1.4390	1.3186	1.2125	1.0000	0.7142
371	2.3515	1.9239	1.7431	1.5808	1.4373	1.3176	1.2120	1.0000	0.7148
372	2.3515	1.9239	1.7431	1.5808	1.4373	1.3176	1.2120	1.0000	0.7148
373	2.3448	1.9198	1.7400	1.5786	1.4358	1.3168	1.2116	1.0000	0.7152
374	2.3364	1.9145	1.7361	1.5758	1.4340	1.3157	1.2111	1.0000	0.7159
375	2.3364	1.9145	1.7361	1.5758	1.4340	1.3157	1.2111	1.0000	0.7159
376	2.3292	1.9101	1.7328	1.5735	1.4324	1.3148	1.2107	1.0000	0.7164
377	2.3292	1.9101	1.7328	1.5735	1.4324	1.3148	1.2107	1.0000	0.7164
378	2.3203	1.9046	1.7287	1.5706	1.4305	1.3137	1.2102	1.0000	0.7171
379	2.3203	1.9046	1.7287	1.5706	1.4305	1.3137	1.2102	1.0000	0.7171
380	2.3119	1.8994	1.7248	1.5678	1.4286	1.3126	1.2097	1.0000	0.7177

State: **CALIFORNIA**
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

**CP Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>								
	<u>0</u>	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
381	2.3060	1.8957	1.7221	1.5658	1.4273	1.3118	1.2093	1.0000	0.7181
382	2.2983	1.8909	1.7185	1.5633	1.4256	1.3108	1.2089	1.0000	0.7187
383	2.2983	1.8909	1.7185	1.5633	1.4256	1.3108	1.2089	1.0000	0.7187
384	2.2912	1.8865	1.7152	1.5609	1.4240	1.3099	1.2084	1.0000	0.7192
385	2.2854	1.8829	1.7125	1.5590	1.4228	1.3092	1.2081	1.0000	0.7197
386	2.2795	1.8793	1.7098	1.5570	1.4215	1.3084	1.2077	1.0000	0.7201
387	2.2731	1.8753	1.7068	1.5549	1.4200	1.3076	1.2073	1.0000	0.7206
388	2.2731	1.8753	1.7068	1.5549	1.4200	1.3076	1.2073	1.0000	0.7206
389	2.2643	1.8698	1.7027	1.5520	1.4181	1.3064	1.2068	1.0000	0.7213
390	2.2541	1.8634	1.6979	1.5486	1.4158	1.3051	1.2062	1.0000	0.7221
391	2.2541	1.8634	1.6979	1.5486	1.4158	1.3051	1.2062	1.0000	0.7221
392	2.2461	1.8585	1.6942	1.5459	1.4140	1.3041	1.2057	1.0000	0.7227
393	2.2392	1.8541	1.6910	1.5436	1.4125	1.3032	1.2052	1.0000	0.7232
394	2.2327	1.8500	1.6879	1.5414	1.4110	1.3023	1.2048	1.0000	0.7237
395	2.2258	1.8457	1.6847	1.5391	1.4095	1.3014	1.2044	1.0000	0.7243
396	2.2258	1.8457	1.6847	1.5391	1.4095	1.3014	1.2044	1.0000	0.7243
397	2.2182	1.8409	1.6811	1.5365	1.4078	1.3004	1.2039	1.0000	0.7249
398	2.2100	1.8358	1.6773	1.5338	1.4059	1.2993	1.2034	1.0000	0.7255
399	2.2016	1.8305	1.6734	1.5310	1.4040	1.2982	1.2029	1.0000	0.7262
400	2.1944	1.8260	1.6700	1.5285	1.4024	1.2972	1.2024	1.0000	0.7268
401	2.1876	1.8218	1.6668	1.5263	1.4009	1.2963	1.2020	1.0000	0.7273
402	2.1861	1.8208	1.6661	1.5257	1.4005	1.2961	1.2019	1.0000	0.7274
403	2.1755	1.8141	1.6611	1.5222	1.3981	1.2947	1.2012	1.0000	0.7283
404	2.1722	1.8121	1.6595	1.5211	1.3974	1.2942	1.2010	1.0000	0.7286
405	2.1659	1.8081	1.6566	1.5189	1.3960	1.2934	1.2006	1.0000	0.7291
406	2.1602	1.8045	1.6539	1.5170	1.3947	1.2926	1.2003	1.0000	0.7295
407	2.1524	1.7996	1.6502	1.5143	1.3929	1.2916	1.1998	1.0000	0.7302
408	2.1389	1.7911	1.6438	1.5097	1.3898	1.2897	1.1989	1.0000	0.7313
409	2.1320	1.7867	1.6405	1.5074	1.3882	1.2888	1.1985	1.0000	0.7319
410	2.1257	1.7827	1.6376	1.5053	1.3868	1.2879	1.1981	1.0000	0.7324
411	2.1181	1.7779	1.6339	1.5026	1.3850	1.2869	1.1976	1.0000	0.7330
412	2.1112	1.7735	1.6306	1.5003	1.3834	1.2859	1.1971	1.0000	0.7336
413	2.1048	1.7695	1.6276	1.4981	1.3820	1.2850	1.1967	1.0000	0.7341
414	2.0963	1.7641	1.6235	1.4952	1.3800	1.2839	1.1961	1.0000	0.7348
415	2.0885	1.7591	1.6198	1.4925	1.3782	1.2828	1.1956	1.0000	0.7355
416	2.0808	1.7542	1.6162	1.4899	1.3764	1.2817	1.1951	1.0000	0.7362
417	2.0720	1.7486	1.6120	1.4868	1.3744	1.2805	1.1945	1.0000	0.7369
418	2.0600	1.7409	1.6062	1.4827	1.3716	1.2788	1.1937	1.0000	0.7379
419	2.0600	1.7409	1.6062	1.4827	1.3716	1.2788	1.1937	1.0000	0.7379
420	2.0449	1.7313	1.5990	1.4775	1.3681	1.2767	1.1927	1.0000	0.7393

State: **CALIFORNIA**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

**CP Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>								
	<u>0</u>	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
421	2.0392	1.7276	1.5962	1.4755	1.3667	1.2759	1.1923	1.0000	0.7398
422	2.0314	1.7227	1.5925	1.4728	1.3649	1.2748	1.1918	1.0000	0.7404
423	2.0182	1.7142	1.5861	1.4682	1.3618	1.2729	1.1909	1.0000	0.7416
424	2.0109	1.7095	1.5826	1.4657	1.3601	1.2719	1.1904	1.0000	0.7422
425	1.9998	1.7024	1.5772	1.4618	1.3574	1.2703	1.1897	1.0000	0.7432
426	1.9934	1.6983	1.5741	1.4596	1.3559	1.2693	1.1892	1.0000	0.7438
427	1.9885	1.6951	1.5718	1.4578	1.3547	1.2686	1.1889	1.0000	0.7443
428	1.9803	1.6898	1.5678	1.4550	1.3528	1.2674	1.1883	1.0000	0.7450
429	1.9693	1.6827	1.5624	1.4511	1.3502	1.2659	1.1876	1.0000	0.7460
430	1.9608	1.6772	1.5583	1.4481	1.3481	1.2646	1.1870	1.0000	0.7468
431	1.9449	1.6670	1.5506	1.4425	1.3443	1.2623	1.1859	1.0000	0.7482
432	1.9355	1.6609	1.5460	1.4392	1.3421	1.2609	1.1852	1.0000	0.7491
433	1.9261	1.6548	1.5414	1.4359	1.3398	1.2595	1.1846	1.0000	0.7500
434	1.9205	1.6512	1.5387	1.4339	1.3385	1.2587	1.1842	1.0000	0.7505
435	1.9088	1.6436	1.5330	1.4298	1.3356	1.2570	1.1833	1.0000	0.7516
436	1.8949	1.6345	1.5261	1.4248	1.3323	1.2549	1.1823	1.0000	0.7530
437	1.8877	1.6298	1.5226	1.4223	1.3305	1.2538	1.1818	1.0000	0.7537
438	1.8784	1.6238	1.5180	1.4189	1.3282	1.2524	1.1812	1.0000	0.7546
439	1.8713	1.6191	1.5145	1.4164	1.3265	1.2513	1.1806	1.0000	0.7552
440	1.8552	1.6086	1.5066	1.4106	1.3225	1.2489	1.1795	1.0000	0.7568
441	1.8486	1.6043	1.5033	1.4083	1.3209	1.2479	1.1790	1.0000	0.7575
442	1.8322	1.5935	1.4952	1.4023	1.3169	1.2454	1.1778	1.0000	0.7591
443	1.8261	1.5895	1.4922	1.4001	1.3153	1.2444	1.1773	1.0000	0.7597
444	1.8102	1.5790	1.4842	1.3944	1.3114	1.2420	1.1761	1.0000	0.7613
445	1.8016	1.5734	1.4800	1.3913	1.3093	1.2406	1.1755	1.0000	0.7622
446	1.7932	1.5678	1.4758	1.3882	1.3071	1.2393	1.1749	1.0000	0.7631
447	1.7766	1.5569	1.4675	1.3822	1.3030	1.2367	1.1736	1.0000	0.7648
448	1.7655	1.5495	1.4619	1.3781	1.3002	1.2350	1.1728	1.0000	0.7659
449	1.7590	1.5452	1.4586	1.3757	1.2985	1.2339	1.1723	1.0000	0.7666
450	1.7388	1.5318	1.4485	1.3683	1.2934	1.2307	1.1707	1.0000	0.7687
451	1.7323	1.5275	1.4452	1.3659	1.2918	1.2297	1.1702	1.0000	0.7694
452	1.7794	1.5589	1.4692	1.3833	1.3039	1.2371	1.1739	1.0000	0.7645
453	1.7032	1.5080	1.4305	1.3551	1.2843	1.2250	1.1679	1.0000	0.7726
454	1.7032	1.5080	1.4305	1.3551	1.2843	1.2250	1.1679	1.0000	0.7726
455	1.7032	1.5080	1.4305	1.3551	1.2843	1.2250	1.1679	1.0000	0.7726
456	1.6621	1.4804	1.4095	1.3398	1.2736	1.2182	1.1646	1.0000	0.7773
457	1.6621	1.4804	1.4095	1.3398	1.2736	1.2182	1.1646	1.0000	0.7773
458	1.6621	1.4804	1.4095	1.3398	1.2736	1.2182	1.1646	1.0000	0.7773
459	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
460	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819

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DEDUCTIBLE RELATIVITIES

**CP Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>								
	<u>0</u>	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
461	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
462	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
463	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
464	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
465	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
466	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
467	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
468	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
469	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
470	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
471	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
472	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
473	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
474	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
475	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
476	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
477	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
478	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
479	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
480	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
481	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
482	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
483	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
484	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
485	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
486	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
487	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
488	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
489	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
490	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
491	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
492	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
493	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
494	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
495	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
496	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
497	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
498	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
499	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
500	1.6210	1.4528	1.3885	1.3244	1.2629	1.2114	1.1613	1.0000	0.7819
Misc Vehicles	2.5062	2.0187	1.8137	1.6311	1.4705	1.3368	1.2209	1.0000	0.7039

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: DECEMBER 28, 2017 (NEW BUSINESS)
 DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

**CL Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1997 & Prior</u>								
	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>	
1	1.68	1.52	1.44	1.38	1.29	1.26	1.00	0.62	
2	1.68	1.52	1.44	1.38	1.29	1.26	1.00	0.62	
3	1.68	1.52	1.44	1.38	1.29	1.26	1.00	0.62	
4	1.68	1.52	1.44	1.38	1.29	1.26	1.00	0.62	
5	1.68	1.52	1.44	1.38	1.29	1.26	1.00	0.62	
6	1.68	1.52	1.44	1.38	1.29	1.26	1.00	0.62	
7	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.67	
8	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.67	
9	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.67	
10	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.67	
11	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.67	
12	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.67	
13	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.67	
14	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
15	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
16	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
17	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
18	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
19	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
20	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
21	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
22	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
23	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
24	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
25	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
26	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
27	1.64	1.45	1.41	1.35	1.25	1.22	1.00	0.74	
Misc Vehicles	1.68	1.52	1.44	1.38	1.29	1.26	1.00	0.62	

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

**CL Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>							
	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
301	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909
302	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909
303	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909
304	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909
305	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909
306	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909
307	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909
308	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909
309	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909
310	1.8558	1.5049	1.3727	1.2509	1.1922	1.1348	1.0000	0.7913
311	1.8558	1.5049	1.3727	1.2509	1.1922	1.1348	1.0000	0.7913
312	1.8558	1.5049	1.3727	1.2509	1.1922	1.1348	1.0000	0.7913
313	1.8558	1.5049	1.3727	1.2509	1.1922	1.1348	1.0000	0.7913
314	1.8558	1.5049	1.3727	1.2509	1.1922	1.1348	1.0000	0.7913
315	1.8524	1.5036	1.3715	1.2504	1.1918	1.1345	1.0000	0.7916
316	1.8524	1.5036	1.3715	1.2504	1.1918	1.1345	1.0000	0.7916
317	1.8524	1.5036	1.3715	1.2504	1.1918	1.1345	1.0000	0.7916
318	1.8524	1.5036	1.3715	1.2504	1.1918	1.1345	1.0000	0.7916
319	1.8505	1.5028	1.3708	1.2500	1.1915	1.1343	1.0000	0.7919
320	1.8505	1.5028	1.3708	1.2500	1.1915	1.1343	1.0000	0.7919
321	1.8505	1.5028	1.3708	1.2500	1.1915	1.1343	1.0000	0.7919
322	1.8505	1.5028	1.3708	1.2500	1.1915	1.1343	1.0000	0.7919
323	1.8460	1.5011	1.3692	1.2493	1.1908	1.1339	1.0000	0.7923
324	1.8460	1.5011	1.3692	1.2493	1.1908	1.1339	1.0000	0.7923
325	1.8460	1.5011	1.3692	1.2493	1.1908	1.1339	1.0000	0.7923
326	1.8460	1.5011	1.3692	1.2493	1.1908	1.1339	1.0000	0.7923
327	1.8460	1.5011	1.3692	1.2493	1.1908	1.1339	1.0000	0.7923
328	1.8460	1.5011	1.3692	1.2493	1.1908	1.1339	1.0000	0.7923
329	1.8409	1.4991	1.3674	1.2484	1.1900	1.1334	1.0000	0.7929
330	1.8409	1.4991	1.3674	1.2484	1.1900	1.1334	1.0000	0.7929
331	1.8409	1.4991	1.3674	1.2484	1.1900	1.1334	1.0000	0.7929
332	1.8409	1.4991	1.3674	1.2484	1.1900	1.1334	1.0000	0.7929
333	1.8409	1.4991	1.3674	1.2484	1.1900	1.1334	1.0000	0.7929
334	1.8362	1.4972	1.3657	1.2476	1.1893	1.1329	1.0000	0.7934
335	1.8362	1.4972	1.3657	1.2476	1.1893	1.1329	1.0000	0.7934
336	1.8362	1.4972	1.3657	1.2476	1.1893	1.1329	1.0000	0.7934
337	1.8362	1.4972	1.3657	1.2476	1.1893	1.1329	1.0000	0.7934
338	1.8362	1.4972	1.3657	1.2476	1.1893	1.1329	1.0000	0.7934
339	1.8321	1.4956	1.3642	1.2469	1.1887	1.1325	1.0000	0.7939
340	1.8321	1.4956	1.3642	1.2469	1.1887	1.1325	1.0000	0.7939

State: **CALIFORNIA**
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

**CL Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>							
	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
341	1.8321	1.4956	1.3642	1.2469	1.1887	1.1325	1.0000	0.7939
342	1.8321	1.4956	1.3642	1.2469	1.1887	1.1325	1.0000	0.7939
343	1.8271	1.4936	1.3624	1.2460	1.1880	1.1320	1.0000	0.7944
344	1.8271	1.4936	1.3624	1.2460	1.1880	1.1320	1.0000	0.7944
345	1.8271	1.4936	1.3624	1.2460	1.1880	1.1320	1.0000	0.7944
346	1.8271	1.4936	1.3624	1.2460	1.1880	1.1320	1.0000	0.7944
347	1.8235	1.4922	1.3612	1.2454	1.1874	1.1316	1.0000	0.7948
348	1.8235	1.4922	1.3612	1.2454	1.1874	1.1316	1.0000	0.7948
349	1.8235	1.4922	1.3612	1.2454	1.1874	1.1316	1.0000	0.7948
350	1.8235	1.4922	1.3612	1.2454	1.1874	1.1316	1.0000	0.7948
351	1.8202	1.4909	1.3600	1.2448	1.1870	1.1313	1.0000	0.7952
352	1.8202	1.4909	1.3600	1.2448	1.1870	1.1313	1.0000	0.7952
353	1.8202	1.4909	1.3600	1.2448	1.1870	1.1313	1.0000	0.7952
354	1.8161	1.4893	1.3585	1.2441	1.1863	1.1309	1.0000	0.7956
355	1.8161	1.4893	1.3585	1.2441	1.1863	1.1309	1.0000	0.7956
356	1.8161	1.4893	1.3585	1.2441	1.1863	1.1309	1.0000	0.7956
357	1.8126	1.4879	1.3572	1.2435	1.1858	1.1305	1.0000	0.7960
358	1.8126	1.4879	1.3572	1.2435	1.1858	1.1305	1.0000	0.7960
359	1.8126	1.4879	1.3572	1.2435	1.1858	1.1305	1.0000	0.7960
360	1.8091	1.4865	1.3559	1.2429	1.1853	1.1302	1.0000	0.7964
361	1.8091	1.4865	1.3559	1.2429	1.1853	1.1302	1.0000	0.7964
362	1.8091	1.4865	1.3559	1.2429	1.1853	1.1302	1.0000	0.7964
363	1.8058	1.4852	1.3547	1.2423	1.1848	1.1298	1.0000	0.7968
364	1.8058	1.4852	1.3547	1.2423	1.1848	1.1298	1.0000	0.7968
365	1.8029	1.4840	1.3537	1.2418	1.1843	1.1295	1.0000	0.7971
366	1.8029	1.4840	1.3537	1.2418	1.1843	1.1295	1.0000	0.7971
367	1.7998	1.4828	1.3526	1.2412	1.1839	1.1292	1.0000	0.7975
368	1.7998	1.4828	1.3526	1.2412	1.1839	1.1292	1.0000	0.7975
369	1.7969	1.4817	1.3515	1.2407	1.1834	1.1289	1.0000	0.7978
370	1.7969	1.4817	1.3515	1.2407	1.1834	1.1289	1.0000	0.7978
371	1.7969	1.4817	1.3515	1.2407	1.1834	1.1289	1.0000	0.7978
372	1.7927	1.4800	1.3500	1.2400	1.1828	1.1285	1.0000	0.7983
373	1.7927	1.4800	1.3500	1.2400	1.1828	1.1285	1.0000	0.7983
374	1.7891	1.4786	1.3487	1.2394	1.1823	1.1281	1.0000	0.7987
375	1.7891	1.4786	1.3487	1.2394	1.1823	1.1281	1.0000	0.7987
376	1.7891	1.4786	1.3487	1.2394	1.1823	1.1281	1.0000	0.7987
377	1.7851	1.4770	1.3472	1.2387	1.1816	1.1277	1.0000	0.7991
378	1.7851	1.4770	1.3472	1.2387	1.1816	1.1277	1.0000	0.7991
379	1.7813	1.4754	1.3458	1.2380	1.1811	1.1273	1.0000	0.7996
380	1.7813	1.4754	1.3458	1.2380	1.1811	1.1273	1.0000	0.7996

State: **CALIFORNIA**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
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DEDUCTIBLE RELATIVITIES

**CL Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>							
	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
381	1.7813	1.4754	1.3458	1.2380	1.1811	1.1273	1.0000	0.7996
382	1.7775	1.4739	1.3445	1.2373	1.1805	1.1269	1.0000	0.8000
383	1.7775	1.4739	1.3445	1.2373	1.1805	1.1269	1.0000	0.8000
384	1.7745	1.4727	1.3434	1.2368	1.1800	1.1266	1.0000	0.8003
385	1.7718	1.4716	1.3424	1.2363	1.1796	1.1264	1.0000	0.8006
386	1.7718	1.4716	1.3424	1.2363	1.1796	1.1264	1.0000	0.8006
387	1.7683	1.4702	1.3411	1.2357	1.1791	1.1260	1.0000	0.8010
388	1.7683	1.4702	1.3411	1.2357	1.1791	1.1260	1.0000	0.8010
389	1.7639	1.4684	1.3395	1.2349	1.1784	1.1255	1.0000	0.8016
390	1.7639	1.4684	1.3395	1.2349	1.1784	1.1255	1.0000	0.8016
391	1.7603	1.4670	1.3382	1.2343	1.1778	1.1252	1.0000	0.8020
392	1.7603	1.4670	1.3382	1.2343	1.1778	1.1252	1.0000	0.8020
393	1.7577	1.4660	1.3372	1.2338	1.1774	1.1249	1.0000	0.8023
394	1.7577	1.4660	1.3372	1.2338	1.1774	1.1249	1.0000	0.8023
395	1.7545	1.4647	1.3360	1.2332	1.1769	1.1246	1.0000	0.8026
396	1.7507	1.4631	1.3346	1.2325	1.1764	1.1242	1.0000	0.8031
397	1.7507	1.4631	1.3346	1.2325	1.1764	1.1242	1.0000	0.8031
398	1.7464	1.4614	1.3330	1.2318	1.1757	1.1237	1.0000	0.8036
399	1.7464	1.4614	1.3330	1.2318	1.1757	1.1237	1.0000	0.8036
400	1.7427	1.4599	1.3317	1.2311	1.1751	1.1233	1.0000	0.8040
401	1.7427	1.4599	1.3317	1.2311	1.1751	1.1233	1.0000	0.8040
402	1.7404	1.4590	1.3308	1.2307	1.1748	1.1231	1.0000	0.8043
403	1.7375	1.4578	1.3298	1.2302	1.1743	1.1228	1.0000	0.8046
404	1.7354	1.4569	1.3290	1.2298	1.1740	1.1226	1.0000	0.8049
405	1.7330	1.4560	1.3281	1.2294	1.1736	1.1223	1.0000	0.8052
406	1.7302	1.4548	1.3270	1.2289	1.1732	1.1220	1.0000	0.8055
407	1.7302	1.4548	1.3270	1.2289	1.1732	1.1220	1.0000	0.8055
408	1.7274	1.4537	1.3260	1.2284	1.1727	1.1218	1.0000	0.8058
409	1.7238	1.4522	1.3247	1.2277	1.1722	1.1214	1.0000	0.8063
410	1.7238	1.4522	1.3247	1.2277	1.1722	1.1214	1.0000	0.8063
411	1.7199	1.4506	1.3232	1.2270	1.1716	1.1210	1.0000	0.8067
412	1.7164	1.4492	1.3219	1.2264	1.1710	1.1206	1.0000	0.8071
413	1.7135	1.4481	1.3209	1.2258	1.1706	1.1203	1.0000	0.8075
414	1.7135	1.4481	1.3209	1.2258	1.1706	1.1203	1.0000	0.8075
415	1.7112	1.4471	1.3200	1.2254	1.1702	1.1200	1.0000	0.8078
416	1.7082	1.4459	1.3189	1.2249	1.1697	1.1197	1.0000	0.8081
417	1.7042	1.4443	1.3174	1.2242	1.1691	1.1193	1.0000	0.8086
418	1.7005	1.4427	1.3160	1.2235	1.1685	1.1189	1.0000	0.8090
419	1.7005	1.4427	1.3160	1.2235	1.1685	1.1189	1.0000	0.8090
420	1.6968	1.4412	1.3146	1.2228	1.1679	1.1185	1.0000	0.8095

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

**CL Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>							
	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
421	1.6940	1.4401	1.3136	1.2223	1.1675	1.1182	1.0000	0.8098
422	1.6901	1.4385	1.3121	1.2216	1.1669	1.1178	1.0000	0.8103
423	1.6901	1.4385	1.3121	1.2216	1.1669	1.1178	1.0000	0.8103
424	1.6856	1.4366	1.3104	1.2207	1.1662	1.1173	1.0000	0.8108
425	1.6832	1.4356	1.3095	1.2203	1.1658	1.1171	1.0000	0.8111
426	1.6807	1.4346	1.3086	1.2198	1.1654	1.1168	1.0000	0.8115
427	1.6779	1.4335	1.3075	1.2193	1.1649	1.1165	1.0000	0.8118
428	1.6743	1.4319	1.3062	1.2186	1.1643	1.1161	1.0000	0.8122
429	1.6700	1.4302	1.3045	1.2179	1.1637	1.1156	1.0000	0.8128
430	1.6700	1.4302	1.3045	1.2179	1.1637	1.1156	1.0000	0.8128
431	1.6649	1.4280	1.3026	1.2169	1.1628	1.1151	1.0000	0.8134
432	1.6607	1.4263	1.3010	1.2161	1.1622	1.1146	1.0000	0.8139
433	1.6607	1.4263	1.3010	1.2161	1.1622	1.1146	1.0000	0.8139
434	1.6564	1.4245	1.2994	1.2153	1.1615	1.1142	1.0000	0.8145
435	1.6538	1.4235	1.2984	1.2148	1.1611	1.1139	1.0000	0.8148
436	1.6499	1.4218	1.2969	1.2141	1.1604	1.1134	1.0000	0.8153
437	1.6473	1.4208	1.2960	1.2136	1.1600	1.1132	1.0000	0.8156
438	1.6438	1.4193	1.2946	1.2130	1.1594	1.1128	1.0000	0.8160
439	1.6411	1.4182	1.2936	1.2125	1.1590	1.1125	1.0000	0.8164
440	1.6382	1.4169	1.2925	1.2119	1.1585	1.1122	1.0000	0.8168
441	1.6328	1.4147	1.2904	1.2109	1.1576	1.1116	1.0000	0.8174
442	1.6292	1.4132	1.2890	1.2102	1.1570	1.1112	1.0000	0.8179
443	1.6292	1.4132	1.2890	1.2102	1.1570	1.1112	1.0000	0.8179
444	1.6243	1.4111	1.2872	1.2093	1.1562	1.1106	1.0000	0.8185
445	1.6204	1.4095	1.2857	1.2086	1.1556	1.1102	1.0000	0.8190
446	1.6162	1.4078	1.2841	1.2078	1.1549	1.1097	1.0000	0.8196
447	1.6120	1.4060	1.2825	1.2070	1.1542	1.1093	1.0000	0.8201
448	1.6074	1.4040	1.2807	1.2061	1.1535	1.1087	1.0000	0.8207
449	1.6074	1.4040	1.2807	1.2061	1.1535	1.1087	1.0000	0.8207
450	1.6016	1.4016	1.2785	1.2050	1.1525	1.1081	1.0000	0.8215
451	1.5971	1.3997	1.2767	1.2041	1.1518	1.1076	1.0000	0.8220
452	1.5935	1.3982	1.2753	1.2034	1.1512	1.1072	1.0000	0.8225
453	1.5909	1.3971	1.2743	1.2029	1.1507	1.1069	1.0000	0.8229
454	1.5865	1.3952	1.2726	1.2021	1.1500	1.1064	1.0000	0.8234
455	1.5821	1.3933	1.2709	1.2012	1.1493	1.1059	1.0000	0.8240
456	1.5758	1.3906	1.2685	1.2000	1.1482	1.1052	1.0000	0.8248
457	1.5716	1.3888	1.2668	1.1992	1.1475	1.1047	1.0000	0.8254
458	1.5670	1.3869	1.2650	1.1983	1.1467	1.1042	1.0000	0.8260
459	1.5651	1.3861	1.2643	1.1979	1.1464	1.1040	1.0000	0.8263
460	1.5622	1.3848	1.2632	1.1974	1.1459	1.1036	1.0000	0.8267

State: **CALIFORNIA**
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

**CL Deductibles
 GROUP**

<u>Symbol</u>	<u>Model Years 1998 & Later</u>							
	<u>50</u>	<u>100</u>	<u>150</u>	<u>200</u>	<u>250</u>	<u>300</u>	<u>500</u>	<u>1000</u>
461	1.5578	1.3829	1.2615	1.1965	1.1452	1.1031	1.0000	0.8273
462	1.5517	1.3803	1.2591	1.1953	1.1442	1.1024	1.0000	0.8281
463	1.5467	1.3782	1.2571	1.1943	1.1433	1.1019	1.0000	0.8288
464	1.5436	1.3768	1.2559	1.1937	1.1428	1.1015	1.0000	0.8292
465	1.5385	1.3746	1.2539	1.1927	1.1419	1.1009	1.0000	0.8299
466	1.5337	1.3725	1.2520	1.1918	1.1411	1.1004	1.0000	0.8306
467	1.5296	1.3708	1.2504	1.1910	1.1404	1.0999	1.0000	0.8311
468	1.5264	1.3694	1.2491	1.1903	1.1398	1.0995	1.0000	0.8316
469	1.5213	1.3672	1.2471	1.1893	1.1390	1.0989	1.0000	0.8323
470	1.5133	1.3637	1.2439	1.1877	1.1376	1.0980	1.0000	0.8334
471	1.5133	1.3637	1.2439	1.1877	1.1376	1.0980	1.0000	0.8334
472	1.5133	1.3637	1.2439	1.1877	1.1376	1.0980	1.0000	0.8334
473	1.5133	1.3637	1.2439	1.1877	1.1376	1.0980	1.0000	0.8334
474	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
475	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
476	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
477	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
478	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
479	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
480	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
481	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
482	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
483	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
484	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
485	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
486	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
487	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
488	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
489	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
490	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
491	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
492	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
493	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
494	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
495	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
496	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
497	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
498	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
499	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
500	1.4875	1.3524	1.2336	1.1826	1.1331	1.0949	1.0000	0.8370
Misc Vehicles	1.8594	1.5063	1.3740	1.2516	1.1928	1.1352	1.0000	0.7909

State: **CALIFORNIA**
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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DEDUCTIBLE RELATIVITIES

WOCD Deductibles
GROUP

		Model Years
<u>Deductible</u>	<u>GROUP</u>	
50	1.00	
100	1.50	
150	2.00	
200	2.25	
250	2.50	
300	2.70	
500	3.50	
1,000	5.01	

State: **CALIFORNIA**
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USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

SYMBOL RELATIVITIES
GROUP

Model Years 1989 & Prior			Model Years 1990 to 1997		
<u>Symbol</u>	<u>CP</u>	<u>CL</u>	<u>Symbol</u>	<u>CP</u>	<u>CL</u>
1	0.18	0.43	1	0.40	0.60
2	0.18	0.43	2	0.52	0.69
3	0.18	0.43	3	0.63	0.75
4	0.21	0.45	4	0.71	0.80
5	0.26	0.50	5	0.80	0.84
6	0.37	0.58	6	0.88	0.88
7	0.52	0.69	7	0.97	0.93
8	0.67	0.79	8	1.06	0.97
10	0.83	0.86	10	1.15	1.02
11	1.01	0.96	11	1.26	1.07
12	1.14	1.06	12	1.39	1.12
13	1.35	1.13	13	1.51	1.18
14	1.66	1.41	14	1.65	1.25
15	1.91	1.52	15	1.82	1.33
16	2.22	1.63	16	1.98	1.41
17	2.59	1.74	17	2.13	1.48
18	3.00	1.85	18	2.28	1.56
19	3.49	1.96	19	2.47	1.64
20	4.06	2.07	20	2.68	1.71
21	5.46	2.30	21	2.92	1.79
			22	3.23	1.89
			23	3.56	2.00
			24	4.05	2.15
			25	4.73	2.40
			26	5.46	2.64
			27	5.4578 ^A	2.6406 ^B

A. Apply +0.74 for each \$10,000 or fraction of \$10,000 above \$80,000.

B. Apply +0.35 for each \$10,000 or fraction of \$10,000 above \$80,000.

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SYMBOL RELATIVITIES
GROUP

Model Years 1998 & Later

<u>Symbol</u>	<u>BI</u>	<u>PD</u>	<u>Symbol</u>	<u>MP</u>	<u>Symbol</u>	<u>CP</u>	<u>CL</u>
501	0.5923	0.4564	101	0.4935	301	0.5000	0.5000
502	0.5923	0.4564	102	0.4935	302	0.5082	0.5065
503	0.5923	0.4564	103	0.4935	303	0.5166	0.5130
504	0.5923	0.4564	104	0.4935	304	0.5251	0.5196
505	0.5923	0.4564	105	0.4935	305	0.5337	0.5263
506	0.5923	0.4564	106	0.4935	306	0.5425	0.5331
507	0.5923	0.4564	107	0.4935	307	0.5514	0.5400
508	0.5923	0.4564	108	0.4935	308	0.5604	0.5469
509	0.5923	0.4564	109	0.4935	309	0.5697	0.5540
510	0.5923	0.4564	110	0.4935	310	0.5790	0.5612
511	0.5923	0.4564	111	0.4935	311	0.5885	0.5684
512	0.5923	0.4564	112	0.4935	312	0.5982	0.5757
513	0.5923	0.4564	113	0.4935	313	0.6081	0.5832
514	0.5923	0.4564	114	0.4935	314	0.6180	0.5907
515	0.5923	0.4564	115	0.4935	315	0.6282	0.5983
516	0.5923	0.4564	116	0.4935	316	0.6385	0.6060
517	0.5923	0.4604	117	0.4935	317	0.6490	0.6138
518	0.5923	0.4645	118	0.4935	318	0.6597	0.6218
519	0.5923	0.4686	119	0.4935	319	0.6705	0.6298
520	0.5923	0.4727	120	0.4935	320	0.6816	0.6379
521	0.5923	0.4769	121	0.4935	321	0.6928	0.6461
522	0.5923	0.4811	122	0.4935	322	0.7042	0.6545
523	0.5923	0.4853	123	0.4935	323	0.7157	0.6629
524	0.5923	0.4896	124	0.4935	324	0.7275	0.6715
525	0.5923	0.4939	125	0.4935	325	0.7395	0.6802
526	0.5923	0.4983	126	0.4935	326	0.7516	0.6889
527	0.5923	0.5027	127	0.4935	327	0.7640	0.6978
528	0.5923	0.5071	128	0.4935	328	0.7765	0.7068
529	0.5923	0.5116	129	0.4935	329	0.7893	0.7159
530	0.5923	0.5161	130	0.4935	330	0.8023	0.7252
531	0.5923	0.5207	131	0.4935	331	0.8154	0.7345
532	0.5923	0.5253	132	0.4935	332	0.8289	0.7440
533	0.5923	0.5299	133	0.4935	333	0.8425	0.7536
534	0.5923	0.5346	134	0.4935	334	0.8563	0.7633
535	0.5923	0.5393	135	0.4935	335	0.8704	0.7732
536	0.5923	0.5441	136	0.4935	336	0.8847	0.7832
537	0.5923	0.5489	137	0.4935	337	0.8992	0.7933
538	0.5923	0.5537	138	0.4935	338	0.9140	0.8035
539	0.5923	0.5586	139	0.4935	339	0.9291	0.8139
540	0.5923	0.5636	140	0.4935	340	0.9443	0.8244
541	0.5923	0.5685	141	0.4935	341	0.9599	0.8350
542	0.5923	0.5736	142	0.4935	342	0.9756	0.8458
543	0.5923	0.5786	143	0.4935	343	0.9917	0.8567
544	0.5923	0.5837	144	0.4935	344	1.0080	0.8678

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 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

SYMBOL RELATIVITIES
GROUP

Model Years 1998 & Later

<u>Symbol</u>	<u>BI</u>	<u>PD</u>	<u>Symbol</u>	<u>MP</u>	<u>Symbol</u>	<u>CP</u>	<u>CL</u>
545	0.5923	0.5889	145	0.4935	345	1.0245	0.8790
546	0.5923	0.5941	146	0.4935	346	1.0414	0.8903
547	0.5923	0.5993	147	0.4935	347	1.0585	0.9018
548	0.5923	0.6046	148	0.4935	348	1.0759	0.9134
549	0.5923	0.6100	149	0.4935	349	1.0936	0.9252
550	0.5923	0.6153	150	0.4935	350	1.1116	0.9371
551	0.5923	0.6208	151	0.4935	351	1.1298	0.9492
552	0.5960	0.6263	152	0.4935	352	1.1484	0.9615
553	0.5998	0.6318	153	0.4935	353	1.1673	0.9739
554	0.6036	0.6374	154	0.4935	354	1.1865	0.9865
555	0.6075	0.6430	155	0.4935	355	1.2060	0.9992
556	0.6114	0.6487	156	0.4935	356	1.2258	1.0121
557	0.6154	0.6544	157	0.4935	357	1.2459	1.0251
558	0.6194	0.6602	158	0.4935	358	1.2664	1.0384
559	0.6235	0.6660	159	0.4935	359	1.2872	1.0518
560	0.6277	0.6719	160	0.4935	360	1.3084	1.0653
561	0.6319	0.6778	161	0.4935	361	1.3299	1.0791
562	0.6362	0.6838	162	0.4935	362	1.3518	1.0930
563	0.6406	0.6898	163	0.4935	363	1.3740	1.1071
564	0.6450	0.6959	164	0.4935	364	1.3966	1.1214
565	0.6495	0.7021	165	0.4935	365	1.4195	1.1359
566	0.6540	0.7083	166	0.4935	366	1.4429	1.1505
567	0.6587	0.7145	167	0.4935	367	1.4666	1.1654
568	0.6634	0.7208	168	0.4935	368	1.4907	1.1804
569	0.6681	0.7272	169	0.4935	369	1.5152	1.1956
570	0.6729	0.7336	170	0.4935	370	1.5401	1.2111
571	0.6779	0.7401	171	0.4935	371	1.5654	1.2267
572	0.6828	0.7466	172	0.4935	372	1.5911	1.2425
573	0.6879	0.7532	173	0.4935	373	1.6173	1.2586
574	0.6930	0.7599	174	0.4935	374	1.6439	1.2748
575	0.6982	0.7666	175	0.4935	375	1.6709	1.2913
576	0.7034	0.7733	176	0.4935	376	1.6984	1.3079
577	0.7088	0.7802	177	0.4935	377	1.7263	1.3248
578	0.7142	0.7870	178	0.4935	378	1.7547	1.3419
579	0.7197	0.7940	179	0.4935	379	1.7835	1.3592
580	0.7253	0.8010	180	0.4935	380	1.8128	1.3767
581	0.7310	0.8081	181	0.4935	381	1.8426	1.3945
582	0.7368	0.8152	182	0.4935	382	1.8729	1.4125
583	0.7426	0.8224	183	0.4935	383	1.9037	1.4307
584	0.7485	0.8297	184	0.4935	384	1.9350	1.4492
585	0.7546	0.8370	185	0.4935	385	1.9668	1.4679
586	0.7606	0.8444	186	0.4935	386	1.9991	1.4868
587	0.7669	0.8518	187	0.4935	387	2.0320	1.5060
588	0.7731	0.8594	188	0.4935	388	2.0654	1.5254

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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

SYMBOL RELATIVITIES
GROUP

Model Years 1998 & Later

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589	0.7795	0.8669	189	0.4935	389	2.0993	1.5451
590	0.7860	0.8746	190	0.4935	390	2.1339	1.5651
591	0.7925	0.8823	191	0.4935	391	2.1689	1.5853
592	0.7992	0.8901	192	0.4935	392	2.2046	1.6057
593	0.8060	0.8980	193	0.4935	393	2.2408	1.6264
594	0.8128	0.9059	194	0.4935	394	2.2777	1.6474
595	0.8198	0.9139	195	0.4935	395	2.3151	1.6687
596	0.8269	0.9220	196	0.4935	396	2.3532	1.6902
597	0.8340	0.9301	197	0.4935	397	2.3918	1.7120
598	0.8413	0.9383	198	0.4935	398	2.4311	1.7341
599	0.8487	0.9466	199	0.4935	399	2.4711	1.7565
600	0.8562	0.9550	200	0.4935	400	2.5117	1.7792
601	0.8638	0.9634	201	0.4995	401	2.5530	1.8021
602	0.8715	0.9719	202	0.5057	402	2.5950	1.8254
603	0.8793	0.9805	203	0.5120	403	2.6376	1.8489
604	0.8873	0.9891	204	0.5183	404	2.6810	1.8728
605	0.8954	0.9979	205	0.5247	405	2.7251	1.8969
606	0.9036	1.0067	206	0.5312	406	2.7699	1.9214
607	0.9118	1.0156	207	0.5379	407	2.8154	1.9462
608	0.9203	1.0245	208	0.5446	408	2.8617	1.9713
609	0.9288	1.0336	209	0.5515	409	2.9087	1.9968
610	0.9375	1.0427	210	0.5584	410	2.9565	2.0225
611	0.9463	1.0519	211	0.5654	411	3.0051	2.0486
612	0.9552	1.0612	212	0.5725	412	3.0545	2.0751
613	0.9643	1.0706	213	0.5798	413	3.1047	2.1018
614	0.9735	1.0800	214	0.5872	414	3.1558	2.1290
615	0.9829	1.0895	215	0.5947	415	3.2076	2.1564
616	0.9923	1.0992	216	0.6022	416	3.2604	2.1843
617	1.0020	1.1089	217	0.6100	417	3.3140	2.2124
618	1.0117	1.1187	218	0.6178	418	3.3684	2.2410
619	1.0216	1.1285	219	0.6257	419	3.4238	2.2699
620	1.0316	1.1385	220	0.6338	420	3.4801	2.2992
621	1.0419	1.1486	221	0.6420	421	3.5373	2.3289
622	1.0522	1.1587	222	0.6503	422	3.5954	2.3589
623	1.0627	1.1689	223	0.6587	423	3.6545	2.3894
624	1.0734	1.1792	224	0.6673	424	3.7146	2.4202
625	1.0842	1.1897	225	0.6760	425	3.7757	2.4514
626	1.0951	1.2002	226	0.6848	426	3.8377	2.4831
627	1.1063	1.2108	227	0.6938	427	3.9008	2.5151
628	1.1176	1.2214	228	0.7029	428	3.9649	2.5475
629	1.1291	1.2322	229	0.7121	429	4.0301	2.5804
630	1.1407	1.2431	230	0.7215	430	4.0964	2.6137
631	1.1525	1.2541	231	0.7310	431	4.1637	2.6474
632	1.1645	1.2652	232	0.7406	432	4.2321	2.6816

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GROUP

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633	1.1767	1.2763	233	0.7505	433	4.3017	2.7162
634	1.1890	1.2876	234	0.7604	434	4.3724	2.7513
635	1.2015	1.2990	235	0.7705	435	4.4443	2.7868
636	1.2142	1.3104	236	0.7808	436	4.5173	2.8227
637	1.2271	1.3220	237	0.7912	437	4.5916	2.8591
638	1.2402	1.3337	238	0.8018	438	4.6671	2.8960
639	1.2535	1.3454	239	0.8126	439	4.7438	2.9334
640	1.2669	1.3573	240	0.8234	440	4.8218	2.9713
641	1.2806	1.3693	241	0.8345	441	4.9010	3.0096
642	1.2945	1.3814	242	0.8458	442	4.9816	3.0484
643	1.3085	1.3936	243	0.8572	443	5.0635	3.0878
644	1.3228	1.4059	244	0.8687	444	5.1467	3.1276
645	1.3374	1.4183	245	0.8805	445	5.2313	3.1680
646	1.3521	1.4308	246	0.8924	446	5.3173	3.2088
647	1.3670	1.4435	247	0.9045	447	5.4047	3.2502
648	1.3822	1.4562	248	0.9168	448	5.4936	3.2922
649	1.3975	1.4691	249	0.9293	449	5.5839	3.3347
650	1.4131	1.4820	250	0.9420	450	5.6756	3.3777
651	1.4131	1.4951	251	0.9548	451	5.7689	3.4213
652	1.4131	1.5083	252	0.9679	452	5.8638	3.4654
653	1.4131	1.5216	253	0.9811	453	5.9602	3.5101
654	1.4131	1.5351	254	0.9946	454	6.0581	3.5554
655	1.4131	1.5486	255	1.0082	455	6.1577	3.6013
656	1.4131	1.5623	256	1.0222	456	6.2589	3.6478
657	1.4131	1.5761	257	1.0362	457	6.3618	3.6949
658	1.4131	1.5900	258	1.0505	458	6.4664	3.7425
659	1.4131	1.6040	259	1.0650	459	6.5727	3.7908
660	1.4131	1.6182	260	1.0798	460	6.6807	3.8397
661	1.4131	1.6325	261	1.0947	461	6.7905	3.8893
662	1.4131	1.6469	262	1.1098	462	6.9022	3.9395
663	1.4131	1.6614	263	1.1253	463	7.0156	3.9903
664	1.4131	1.6761	264	1.1409	464	7.1309	4.0418
665	1.4131	1.6909	265	1.1568	465	7.2482	4.0940
666	1.4131	1.7058	266	1.1729	466	7.3673	4.1468
667	1.4131	1.7209	267	1.1893	467	7.4884	4.2003
668	1.4131	1.7361	268	1.2059	468	7.6115	4.2545
669	1.4131	1.7514	269	1.2228	469	7.7366	4.3094
670	1.4131	1.7669	270	1.2399	470	7.8638	4.3650
671	1.4131	1.7825	271	1.2572	471	7.9931	4.4213
672	1.4131	1.7982	272	1.2749	472	8.1244	4.4784
673	1.4131	1.8141	273	1.2928	473	8.2580	4.5362
674	1.4131	1.8301	274	1.3110	474	8.3937	4.5947
675	1.4131	1.8463	275	1.3294	475	8.5317	4.6540
676	1.4131	1.8463	276	1.3481	476	8.6720	4.7140

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GROUP

Model Years 1998 & Later

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677	1.4131	1.8463	277	1.3672	477	8.8145	4.7749
678	1.4131	1.8463	278	1.3865	478	8.9594	4.8365
679	1.4131	1.8463	279	1.4061	479	9.1067	4.8989
680	1.4131	1.8463	280	1.4260	480	9.2564	4.9621
681	1.4131	1.8463	281	1.4462	481	9.4085	5.0261
682	1.4131	1.8463	282	1.4668	482	9.5632	5.0910
683	1.4131	1.8463	283	1.4876	483	9.7204	5.1567
684	1.4131	1.8463	284	1.5087	484	9.8802	5.2232
685	1.4131	1.8463	285	1.5301	485	10.0426	5.2906
686	1.4131	1.8463	286	1.5519	486	10.2076	5.3589
687	1.4131	1.8463	287	1.5740	487	10.3754	5.4280
688	1.4131	1.8463	288	1.5965	488	10.5460	5.4981
689	1.4131	1.8463	289	1.6193	489	10.7193	5.5690
690	1.4131	1.8463	290	1.6424	490	10.8955	5.6409
691	1.4131	1.8463	291	1.6424	491	11.0746	5.7137
692	1.4131	1.8463	292	1.6424	492	11.2567	5.7874
693	1.4131	1.8463	293	1.6424	493	11.4417	5.8621
694	1.4131	1.8463	294	1.6424	494	11.6298	5.9377
695	1.4131	1.8463	295	1.6424	495	11.8210	6.0143
696	1.4131	1.8463	296	1.6424	496	12.0153	6.0919
697	1.4131	1.8463	297	1.6424	497	12.2128	6.1705
698	1.4131	1.8463	298	1.6424	498	12.4135	6.2502
699	1.4131	1.8463	299	1.6424	499	12.6176	6.3308
700	1.4131	1.8463	300	1.6424	500	12.8250 ^C	6.4125 ^D
999	1.0000	1.0000	999	1.0000			

C. Apply +0.925 for each \$10,000 or fraction of \$10,000 above \$150,000.

D. Apply +0.4375 for each \$10,000 or fraction of \$10,000 above \$150,000.

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MODEL YEAR RELATIVITIES

GROUP

<u>Model Year</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>CP</u>	<u>CL</u>
1986 & Prior	0.8225	0.8225	0.8225	0.5537	0.3770
1987	0.8278	0.8278	0.8278	0.5703	0.3958
1988	0.8361	0.8361	0.8361	0.5874	0.4156
1989	0.8445	0.8445	0.8445	0.6050	0.4364
1990	0.8529	0.8529	0.8529	0.6231	0.4582
1991	0.8614	0.8614	0.8614	0.6418	0.4811
1992	0.8700	0.8700	0.8700	0.6611	0.5052
1993	0.8787	0.8787	0.8787	0.6809	0.5305
1994	0.8875	0.8875	0.8875	0.7013	0.5570
1995	0.8964	0.8964	0.8964	0.7223	0.5848
1996	0.9054	0.9054	0.9054	0.7440	0.6140
1997	0.9145	0.9145	0.9145	0.7663	0.6447
1998	0.9236	0.9236	0.9236	0.7893	0.6769
1999	0.9328	0.9328	0.9328	0.8130	0.7107
2000	0.9421	0.9421	0.9421	0.8374	0.7462
2001	0.9515	0.9515	0.9515	0.8625	0.7835
2002	0.9610	0.9610	0.9610	0.8884	0.8227
2003	0.9706	0.9706	0.9706	0.9151	0.8638
2004	0.9803	0.9803	0.9803	0.9426	0.9070
2005	0.9901	0.9901	0.9901	0.9709	0.9524
2006	1.0000	1.0000	1.0000	1.0000	1.0000
2007	1.0100	1.0100	1.0100	1.0300	1.0500
2008	1.0201	1.0201	1.0201	1.0609	1.1025
2009	1.0303	1.0303	1.0303	1.0927	1.1576
2010	1.0406	1.0406	1.0406	1.1255	1.2155
2011	1.0510	1.0510	1.0510	1.1593	1.2763
2012	1.0615	1.0615	1.0615	1.1941	1.3401
2013	1.0721	1.0721	1.0721	1.2419	1.4473
2014	1.0828	1.0828	1.0828	1.2916	1.5631
2015	1.0936	1.0936	1.0936	1.3433	1.6881
2016	1.1045	1.1045	1.1045	1.3970	1.8231
2017	1.1155	1.1155	1.1155	1.4529	1.9689
2018	1.1267	1.1267	1.1267	1.5110	2.1264
2019	1.1380	1.1380	1.1380	1.5714	2.2965
2020	1.1494	1.1494	1.1494	1.6343	2.4802
Add. Years*	1.0100	1.0100	1.0100	1.0400	1.0800

*For subsequent model years not shown apply the appropriate factor.

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DISCOUNTS
USAA

Antitheft

	<u>CP</u>
Vehicle Recovery System	0.20

Passive Restraint

	<u>MP</u>	<u>EB</u>
Air Bag (Both Sides)	0.09	0.09
Air Bag (Drivers Side Only)	0.06	0.06
Passive Seat Belt (Both Sides)	0.03	0.03
Passive Seat Belt (Drivers Side Only)	0.03	0.03

New Vehicle Discount

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>CP</u>	<u>CL</u>
Veh Age 1	0.11	0.11	0.11	0.05	0.11
Veh Age 2	0.08	0.08	0.08	0.05	0.08
Veh Age 3	0.04	0.04	0.04	0.04	0.04
Veh Age 4	0.00	0.00	0.00	0.00	0.00

Away-At-School Discount

<u>Age</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.25	0.25	0.25	0.25	0.25	0.25	0.25
1	0.24	0.24	0.24	0.24	0.24	0.24	0.24
2	0.23	0.23	0.23	0.23	0.23	0.23	0.23
3	0.22	0.22	0.22	0.22	0.22	0.22	0.22
4	0.21	0.21	0.21	0.21	0.21	0.21	0.21
5	0.20	0.20	0.20	0.20	0.20	0.20	0.20
6	0.18	0.18	0.18	0.18	0.18	0.18	0.18
7	0.16	0.16	0.16	0.16	0.16	0.16	0.16
8	0.14	0.14	0.14	0.14	0.14	0.14	0.14
9	0.12	0.12	0.12	0.12	0.12	0.12	0.12
10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
11	0.08	0.08	0.08	0.08	0.08	0.08	0.08
12	0.06	0.06	0.06	0.06	0.06	0.06	0.06
13	0.04	0.04	0.04	0.04	0.04	0.04	0.04
14	0.02	0.02	0.02	0.02	0.02	0.02	0.02

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DISCOUNTS
USAA

Good Student Discount

<u>Age</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.10	0.10	0.10	0.10	0.10	0.10	0.10
1	0.09	0.09	0.09	0.09	0.09	0.09	0.09
2	0.08	0.08	0.08	0.08	0.08	0.08	0.08
3	0.07	0.07	0.07	0.07	0.07	0.07	0.07
4	0.06	0.06	0.06	0.06	0.06	0.06	0.06
5	0.05	0.05	0.05	0.05	0.05	0.05	0.05
6	0.04	0.04	0.04	0.04	0.04	0.04	0.04
7	0.03	0.03	0.03	0.03	0.03	0.03	0.03
8	0.02	0.02	0.02	0.02	0.02	0.02	0.02
9	0.01	0.01	0.01	0.01	0.01	0.01	0.01

Other

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>EB</u>	<u>CP</u>	<u>CL</u>	<u>RR</u>	<u>T&L</u>
Premier Operator Discount	0.15	0.15	0.15	0.15	--	0.15	0.15	--	--
Good Driver Discount	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
Mature Driver Improvement Course	0.05	0.05	--	--	--	--	--	--	--
Military Installation Garaging Storage Discount	--	--	--	--	--	0.05	0.05	--	--
	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60

Multi-Policy Discount

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
HO Only No Life Insurance	0.1000	0.1000	0.1000	0.1000	0.1000	0.1000	0.1000
HO Plus No Life Insurance	0.1200	0.1200	0.1200	0.1200	0.1200	0.1200	0.1200
Renters Only No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Renters Plus No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
Umbrella Only No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Umbrella Plus No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
One P&C Product No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Two P&C Products No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
No P&C Products No Life Insurance	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
HO Only Life Insurance	0.1270	0.1270	0.1270	0.1270	0.1270	0.1270	0.1270
HO Plus Life Insurance	0.1464	0.1464	0.1464	0.1464	0.1464	0.1464	0.1464
Renters Only Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Renters Plus Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979
Umbrella Only Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Umbrella Plus Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979
One P&C Product Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Two P&C Products Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979

State: **CALIFORNIA**
Line of Business: **AUTO**
Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS

USAA

No P&C Products	Life Insurance	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300
-----------------	----------------	--------	--------	--------	--------	--------	--------	--------	--------

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS
USAA

Persistency

Years							
	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1	0.02	0.02	0.02	0.02	0.02	0.02	0.02
2	0.03	0.03	0.03	0.03	0.03	0.03	0.03
3	0.04	0.04	0.04	0.04	0.04	0.04	0.04
4	0.04	0.04	0.04	0.04	0.04	0.04	0.04
5	0.05	0.05	0.05	0.05	0.05	0.05	0.05
6	0.05	0.05	0.05	0.05	0.05	0.05	0.05
7	0.06	0.06	0.06	0.06	0.06	0.06	0.06
8	0.06	0.06	0.06	0.06	0.06	0.06	0.06
9	0.07	0.07	0.07	0.07	0.07	0.07	0.07
10	0.07	0.07	0.07	0.07	0.07	0.07	0.07
11	0.08	0.08	0.08	0.08	0.08	0.08	0.08
12	0.08	0.08	0.08	0.08	0.08	0.08	0.08
13	0.08	0.08	0.08	0.08	0.08	0.08	0.08
14	0.08	0.08	0.08	0.08	0.08	0.08	0.08
15	0.09	0.09	0.09	0.09	0.09	0.09	0.09
16	0.09	0.09	0.09	0.09	0.09	0.09	0.09
17	0.09	0.09	0.09	0.09	0.09	0.09	0.09
18	0.09	0.09	0.09	0.09	0.09	0.09	0.09
19	0.09	0.09	0.09	0.09	0.09	0.09	0.09
20	0.10	0.10	0.10	0.10	0.10	0.10	0.10
21	0.10	0.10	0.10	0.10	0.10	0.10	0.10
22	0.10	0.10	0.10	0.10	0.10	0.10	0.10
23	0.10	0.10	0.10	0.10	0.10	0.10	0.10
24	0.10	0.10	0.10	0.10	0.10	0.10	0.10
25+	0.12	0.12	0.12	0.12	0.12	0.12	0.12

CA-R-9.5

CONFIDENTIAL

Exhibit A
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CASTRO_001143

WOCD

0.15
0.20
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0.60

CA-R-9.6

CA-R-9.7

CONFIDENTIAL

Exhibit A
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CASTRO_001145

CA-R-9.8

CONFIDENTIAL

Exhibit A
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CASTRO_001146

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS
CIC

Antitheft

	<u>CP</u>
Vehicle Recovery System	0.20

Passive Restraint

	<u>MP</u>	<u>EB</u>
Air Bag (Both Sides)	0.09	0.09
Air Bag (Drivers Side Only)	0.06	0.06
Passive Seat Belt (Both Sides)	0.03	0.03
Passive Seat Belt (Drivers Side Only)	0.03	0.03

New Vehicle Discount

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>CP</u>	<u>CL</u>
Veh Age 1	0.11	0.11	0.11	0.05	0.11
Veh Age 2	0.08	0.08	0.08	0.05	0.08
Veh Age 3	0.04	0.04	0.04	0.04	0.04
Veh Age 4	0.00	0.00	0.00	0.00	0.00

Away-At-School Discount

<u>Age</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.25	0.25	0.25	0.25	0.25	0.25	0.25
1	0.24	0.24	0.24	0.24	0.24	0.24	0.24
2	0.23	0.23	0.23	0.23	0.23	0.23	0.23
3	0.22	0.22	0.22	0.22	0.22	0.22	0.22
4	0.21	0.21	0.21	0.21	0.21	0.21	0.21
5	0.20	0.20	0.20	0.20	0.20	0.20	0.20
6	0.18	0.18	0.18	0.18	0.18	0.18	0.18
7	0.16	0.16	0.16	0.16	0.16	0.16	0.16
8	0.14	0.14	0.14	0.14	0.14	0.14	0.14
9	0.12	0.12	0.12	0.12	0.12	0.12	0.12
10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
11	0.08	0.08	0.08	0.08	0.08	0.08	0.08
12	0.06	0.06	0.06	0.06	0.06	0.06	0.06
13	0.04	0.04	0.04	0.04	0.04	0.04	0.04
14	0.02	0.02	0.02	0.02	0.02	0.02	0.02

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS
CIC

Good Student Discount

<u>Age</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.10	0.10	0.10	0.10	0.10	0.10	0.10
1	0.09	0.09	0.09	0.09	0.09	0.09	0.09
2	0.08	0.08	0.08	0.08	0.08	0.08	0.08
3	0.07	0.07	0.07	0.07	0.07	0.07	0.07
4	0.06	0.06	0.06	0.06	0.06	0.06	0.06
5	0.05	0.05	0.05	0.05	0.05	0.05	0.05
6	0.04	0.04	0.04	0.04	0.04	0.04	0.04
7	0.03	0.03	0.03	0.03	0.03	0.03	0.03
8	0.02	0.02	0.02	0.02	0.02	0.02	0.02
9	0.01	0.01	0.01	0.01	0.01	0.01	0.01

Other

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>EB</u>	<u>CP</u>	<u>CL</u>	<u>RR</u>	<u>T&L</u>
Premier Operator Discount	0.15	0.15	0.15	0.15	--	0.15	0.15	--	--
Good Driver Discount	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
Mature Driver Improvement Course	0.05	0.05	--	--	--	--	--	--	--
Military Installation Garaging Storage Discount	--	--	--	--	--	0.05	0.05	--	--
	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60

Multi-Policy Discount

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
HO Only No Life Insurance	0.1000	0.1000	0.1000	0.1000	0.1000	0.1000	0.1000
HO Plus No Life Insurance	0.1200	0.1200	0.1200	0.1200	0.1200	0.1200	0.1200
Renters Only No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Renters Plus No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
Umbrella Only No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Umbrella Plus No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
One P&C Product No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Two P&C Products No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
No P&C Products No Life Insurance	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
HO Only Life Insurance	0.1270	0.1270	0.1270	0.1270	0.1270	0.1270	0.1270
HO Plus Life Insurance	0.1464	0.1464	0.1464	0.1464	0.1464	0.1464	0.1464
Renters Only Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Renters Plus Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979
Umbrella Only Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Umbrella Plus Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979
One P&C Product Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Two P&C Products Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979

State: **CALIFORNIA**
Line of Business: **AUTO**
Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS
CIC

No P&C Products	Life Insurance	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300
-----------------	----------------	--------	--------	--------	--------	--------	--------	--------	--------

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS
CIC

Persistency

Years							
	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1	0.02	0.02	0.02	0.02	0.02	0.02	0.02
2	0.03	0.03	0.03	0.03	0.03	0.03	0.03
3	0.04	0.04	0.04	0.04	0.04	0.04	0.04
4	0.04	0.04	0.04	0.04	0.04	0.04	0.04
5	0.05	0.05	0.05	0.05	0.05	0.05	0.05
6	0.05	0.05	0.05	0.05	0.05	0.05	0.05
7	0.06	0.06	0.06	0.06	0.06	0.06	0.06
8	0.06	0.06	0.06	0.06	0.06	0.06	0.06
9	0.07	0.07	0.07	0.07	0.07	0.07	0.07
10	0.07	0.07	0.07	0.07	0.07	0.07	0.07
11	0.08	0.08	0.08	0.08	0.08	0.08	0.08
12	0.08	0.08	0.08	0.08	0.08	0.08	0.08
13	0.08	0.08	0.08	0.08	0.08	0.08	0.08
14	0.08	0.08	0.08	0.08	0.08	0.08	0.08
15	0.09	0.09	0.09	0.09	0.09	0.09	0.09
16	0.09	0.09	0.09	0.09	0.09	0.09	0.09
17	0.09	0.09	0.09	0.09	0.09	0.09	0.09
18	0.09	0.09	0.09	0.09	0.09	0.09	0.09
19	0.09	0.09	0.09	0.09	0.09	0.09	0.09
20	0.10	0.10	0.10	0.10	0.10	0.10	0.10
21	0.10	0.10	0.10	0.10	0.10	0.10	0.10
22	0.10	0.10	0.10	0.10	0.10	0.10	0.10
23	0.10	0.10	0.10	0.10	0.10	0.10	0.10
24	0.10	0.10	0.10	0.10	0.10	0.10	0.10
25+	0.12	0.12	0.12	0.12	0.12	0.12	0.12

CA-R-9.13

CONFIDENTIAL

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WOCD

0.15
0.20
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0.60

CA-R-9.15

CONFIDENTIAL

Exhibit A
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CASTRO_001153

CA-R-9.16

CONFIDENTIAL

Exhibit A
207

CASTRO_001154

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS
GIC

Antitheft

	<u>CP</u>
Vehicle Recovery System	0.20

Passive Restraint

	<u>MP</u>	<u>EB</u>
Air Bag (Both Sides)	0.09	0.09
Air Bag (Drivers Side Only)	0.06	0.06
Passive Seat Belt (Both Sides)	0.03	0.03
Passive Seat Belt (Drivers Side Only)	0.03	0.03

New Vehicle Discount

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>CP</u>	<u>CL</u>
Veh Age 1	0.11	0.11	0.11	0.05	0.11
Veh Age 2	0.08	0.08	0.08	0.05	0.08
Veh Age 3	0.04	0.04	0.04	0.04	0.04
Veh Age 4	0.00	0.00	0.00	0.00	0.00

Away-At-School Discount

<u>Age</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.25	0.25	0.25	0.25	0.25	0.25	0.25
1	0.24	0.24	0.24	0.24	0.24	0.24	0.24
2	0.23	0.23	0.23	0.23	0.23	0.23	0.23
3	0.22	0.22	0.22	0.22	0.22	0.22	0.22
4	0.21	0.21	0.21	0.21	0.21	0.21	0.21
5	0.20	0.20	0.20	0.20	0.20	0.20	0.20
6	0.18	0.18	0.18	0.18	0.18	0.18	0.18
7	0.16	0.16	0.16	0.16	0.16	0.16	0.16
8	0.14	0.14	0.14	0.14	0.14	0.14	0.14
9	0.12	0.12	0.12	0.12	0.12	0.12	0.12
10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
11	0.08	0.08	0.08	0.08	0.08	0.08	0.08
12	0.06	0.06	0.06	0.06	0.06	0.06	0.06
13	0.04	0.04	0.04	0.04	0.04	0.04	0.04
14	0.02	0.02	0.02	0.02	0.02	0.02	0.02

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS
GIC

Good Student Discount

<u>Age</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.10	0.10	0.10	0.10	0.10	0.10	0.10
1	0.09	0.09	0.09	0.09	0.09	0.09	0.09
2	0.08	0.08	0.08	0.08	0.08	0.08	0.08
3	0.07	0.07	0.07	0.07	0.07	0.07	0.07
4	0.06	0.06	0.06	0.06	0.06	0.06	0.06
5	0.05	0.05	0.05	0.05	0.05	0.05	0.05
6	0.04	0.04	0.04	0.04	0.04	0.04	0.04
7	0.03	0.03	0.03	0.03	0.03	0.03	0.03
8	0.02	0.02	0.02	0.02	0.02	0.02	0.02
9	0.01	0.01	0.01	0.01	0.01	0.01	0.01

Other

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>EB</u>	<u>CP</u>	<u>CL</u>	<u>RR</u>	<u>T&L</u>
Premier Operator Discount	0.20	0.20	0.20	0.20	--	0.20	0.20	--	--
Good Driver Discount	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
Mature Driver Improvement Course	0.05	0.05	--	--	--	--	--	--	--
Military Installation Garaging Storage Discount	--	--	--	--	--	0.05	0.05	--	--
	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60

Multi-Policy Discount

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
HO Only No Life Insurance	0.1000	0.1000	0.1000	0.1000	0.1000	0.1000	0.1000
HO Plus No Life Insurance	0.1200	0.1200	0.1200	0.1200	0.1200	0.1200	0.1200
Renters Only No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Renters Plus No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
Umbrella Only No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Umbrella Plus No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
One P&C Product No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Two P&C Products No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
No P&C Products No Life Insurance	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
HO Only Life Insurance	0.1270	0.1270	0.1270	0.1270	0.1270	0.1270	0.1270
HO Plus Life Insurance	0.1464	0.1464	0.1464	0.1464	0.1464	0.1464	0.1464
Renters Only Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Renters Plus Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979
Umbrella Only Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Umbrella Plus Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979
One P&C Product Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Two P&C Products Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979

State: **CALIFORNIA**
Line of Business: **AUTO**
Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS

GIC

No P&C Products	Life Insurance	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300
-----------------	----------------	--------	--------	--------	--------	--------	--------	--------	--------

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS
GIC

Persistency

Years							
	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1	0.02	0.02	0.02	0.02	0.02	0.02	0.02
2	0.03	0.03	0.03	0.03	0.03	0.03	0.03
3	0.04	0.04	0.04	0.04	0.04	0.04	0.04
4	0.04	0.04	0.04	0.04	0.04	0.04	0.04
5	0.05	0.05	0.05	0.05	0.05	0.05	0.05
6	0.05	0.05	0.05	0.05	0.05	0.05	0.05
7	0.06	0.06	0.06	0.06	0.06	0.06	0.06
8	0.06	0.06	0.06	0.06	0.06	0.06	0.06
9	0.07	0.07	0.07	0.07	0.07	0.07	0.07
10	0.07	0.07	0.07	0.07	0.07	0.07	0.07
11	0.08	0.08	0.08	0.08	0.08	0.08	0.08
12	0.08	0.08	0.08	0.08	0.08	0.08	0.08
13	0.08	0.08	0.08	0.08	0.08	0.08	0.08
14	0.08	0.08	0.08	0.08	0.08	0.08	0.08
15	0.09	0.09	0.09	0.09	0.09	0.09	0.09
16	0.09	0.09	0.09	0.09	0.09	0.09	0.09
17	0.09	0.09	0.09	0.09	0.09	0.09	0.09
18	0.09	0.09	0.09	0.09	0.09	0.09	0.09
19	0.09	0.09	0.09	0.09	0.09	0.09	0.09
20	0.10	0.10	0.10	0.10	0.10	0.10	0.10
21	0.10	0.10	0.10	0.10	0.10	0.10	0.10
22	0.10	0.10	0.10	0.10	0.10	0.10	0.10
23	0.10	0.10	0.10	0.10	0.10	0.10	0.10
24	0.10	0.10	0.10	0.10	0.10	0.10	0.10
25+	0.12	0.12	0.12	0.12	0.12	0.12	0.12

CA-R-9.21

CONFIDENTIAL

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CASTRO_001159

WOCD

0.20
0.20
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0.60

CA-R-9.22

CA-R-9.23

CONFIDENTIAL

Exhibit A
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CASTRO_001161

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CONFIDENTIAL

Exhibit A
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CASTRO_001162

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS

Garrison

Antitheft

	<u>CP</u>
Vehicle Recovery System	0.20

Passive Restraint

	<u>MP</u>	<u>EB</u>
Air Bag (Both Sides)	0.09	0.09
Air Bag (Drivers Side Only)	0.06	0.06
Passive Seat Belt (Both Sides)	0.03	0.03
Passive Seat Belt (Drivers Side Only)	0.03	0.03

New Vehicle Discount

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>CP</u>	<u>CL</u>
Veh Age 1	0.11	0.11	0.11	0.05	0.11
Veh Age 2	0.08	0.08	0.08	0.05	0.08
Veh Age 3	0.04	0.04	0.04	0.04	0.04
Veh Age 4	0.00	0.00	0.00	0.00	0.00

Away-At-School Discount

<u>Age</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.25	0.25	0.25	0.25	0.25	0.25	0.25
1	0.24	0.24	0.24	0.24	0.24	0.24	0.24
2	0.23	0.23	0.23	0.23	0.23	0.23	0.23
3	0.22	0.22	0.22	0.22	0.22	0.22	0.22
4	0.21	0.21	0.21	0.21	0.21	0.21	0.21
5	0.20	0.20	0.20	0.20	0.20	0.20	0.20
6	0.18	0.18	0.18	0.18	0.18	0.18	0.18
7	0.16	0.16	0.16	0.16	0.16	0.16	0.16
8	0.14	0.14	0.14	0.14	0.14	0.14	0.14
9	0.12	0.12	0.12	0.12	0.12	0.12	0.12
10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
11	0.08	0.08	0.08	0.08	0.08	0.08	0.08
12	0.06	0.06	0.06	0.06	0.06	0.06	0.06
13	0.04	0.04	0.04	0.04	0.04	0.04	0.04
14	0.02	0.02	0.02	0.02	0.02	0.02	0.02

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS

Garrison

Good Student Discount

<u>Age</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.10	0.10	0.10	0.10	0.10	0.10	0.10
1	0.09	0.09	0.09	0.09	0.09	0.09	0.09
2	0.08	0.08	0.08	0.08	0.08	0.08	0.08
3	0.07	0.07	0.07	0.07	0.07	0.07	0.07
4	0.06	0.06	0.06	0.06	0.06	0.06	0.06
5	0.05	0.05	0.05	0.05	0.05	0.05	0.05
6	0.04	0.04	0.04	0.04	0.04	0.04	0.04
7	0.03	0.03	0.03	0.03	0.03	0.03	0.03
8	0.02	0.02	0.02	0.02	0.02	0.02	0.02
9	0.01	0.01	0.01	0.01	0.01	0.01	0.01

Other

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>EB</u>	<u>CP</u>	<u>CL</u>	<u>RR</u>	<u>T&L</u>
Premier Operator Discount	0.15	0.15	0.15	0.15	--	0.15	0.15	--	--
Good Driver Discount	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
Mature Driver Improvement Course	0.05	0.05	--	--	--	--	--	--	--
Military Installation Garaging Storage Discount	--	--	--	--	--	0.05	0.05	--	--
	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60

Multi-Policy Discount

	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
HO Only No Life Insurance	0.1000	0.1000	0.1000	0.1000	0.1000	0.1000	0.1000
HO Plus No Life Insurance	0.1200	0.1200	0.1200	0.1200	0.1200	0.1200	0.1200
Renters Only No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Renters Plus No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
Umbrella Only No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Umbrella Plus No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
One P&C Product No Life Insurance	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400	0.0400
Two P&C Products No Life Insurance	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700	0.0700
No P&C Products No Life Insurance	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
HO Only Life Insurance	0.1270	0.1270	0.1270	0.1270	0.1270	0.1270	0.1270
HO Plus Life Insurance	0.1464	0.1464	0.1464	0.1464	0.1464	0.1464	0.1464
Renters Only Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Renters Plus Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979
Umbrella Only Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Umbrella Plus Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979
One P&C Product Life Insurance	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688	0.0688
Two P&C Products Life Insurance	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979	0.0979

State: **CALIFORNIA**
Line of Business: **AUTO**
Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS

Garrison

No P&C Products	Life Insurance	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300	0.0300
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State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

DISCOUNTS

Garrison

Persistency

Years	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
	0	0.00	0.00	0.00	0.00	0.00	0.00
1	0.02	0.02	0.02	0.02	0.02	0.02	0.02
2	0.03	0.03	0.03	0.03	0.03	0.03	0.03
3	0.04	0.04	0.04	0.04	0.04	0.04	0.04
4	0.04	0.04	0.04	0.04	0.04	0.04	0.04
5	0.05	0.05	0.05	0.05	0.05	0.05	0.05
6	0.05	0.05	0.05	0.05	0.05	0.05	0.05
7	0.06	0.06	0.06	0.06	0.06	0.06	0.06
8	0.06	0.06	0.06	0.06	0.06	0.06	0.06
9	0.07	0.07	0.07	0.07	0.07	0.07	0.07
10	0.07	0.07	0.07	0.07	0.07	0.07	0.07
11	0.08	0.08	0.08	0.08	0.08	0.08	0.08
12	0.08	0.08	0.08	0.08	0.08	0.08	0.08
13	0.08	0.08	0.08	0.08	0.08	0.08	0.08
14	0.08	0.08	0.08	0.08	0.08	0.08	0.08
15	0.09	0.09	0.09	0.09	0.09	0.09	0.09
16	0.09	0.09	0.09	0.09	0.09	0.09	0.09
17	0.09	0.09	0.09	0.09	0.09	0.09	0.09
18	0.09	0.09	0.09	0.09	0.09	0.09	0.09
19	0.09	0.09	0.09	0.09	0.09	0.09	0.09
20	0.10	0.10	0.10	0.10	0.10	0.10	0.10
21	0.10	0.10	0.10	0.10	0.10	0.10	0.10
22	0.10	0.10	0.10	0.10	0.10	0.10	0.10
23	0.10	0.10	0.10	0.10	0.10	0.10	0.10
24	0.10	0.10	0.10	0.10	0.10	0.10	0.10
25+	0.12	0.12	0.12	0.12	0.12	0.12	0.12

CA-R-9.29

CONFIDENTIAL

Exhibit A
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CASTRO_001167

WOCD

0.15
0.20
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0.60

CA-R-9.30

CA-R-9.31

CONFIDENTIAL

Exhibit A
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CA-R-9.32

CONFIDENTIAL

Exhibit A
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CASTRO_001170

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	2.01	2.01	1.42	1.10	1.17	1.81	1.10
1	1.83	1.68	1.33	1.10	1.20	1.62	1.10
2	1.64	1.51	1.26	1.07	1.24	1.50	1.07
3	1.46	1.47	1.22	1.05	1.27	1.44	1.05
4	1.36	1.46	1.21	1.02	1.31	1.37	1.02
5	1.26	1.45	1.20	1.02	1.33	1.31	1.02
6	1.15	1.43	1.10	0.97	1.33	1.25	0.97
7	1.12	1.27	1.10	0.97	1.32	1.20	0.97
8	1.06	1.16	1.06	0.92	1.31	1.15	0.92
9	1.01	1.06	0.99	0.92	1.30	1.09	0.92
10	0.98	0.96	0.99	0.92	1.29	1.04	0.92
11	0.94	0.94	0.99	0.92	1.28	1.00	0.92
12	0.92	0.93	0.99	0.92	1.26	0.99	0.92
13	0.90	0.91	0.95	0.92	1.23	0.98	0.92
14	0.89	0.89	0.95	0.92	1.20	0.96	0.92
15	0.89	0.88	0.95	0.92	1.18	0.95	0.92
16	0.88	0.88	0.95	0.92	1.16	0.94	0.92
17	0.88	0.87	0.95	0.95	1.14	0.94	0.95
18	0.88	0.87	0.95	0.95	1.12	0.93	0.95
19	0.88	0.87	0.95	0.95	1.10	0.92	0.95
20	0.88	0.87	0.95	0.95	1.09	0.91	0.95
21	0.88	0.87	0.94	0.95	1.07	0.91	0.95
22	0.88	0.86	0.92	0.95	1.05	0.91	0.95
23	0.88	0.86	0.91	0.96	1.04	0.90	0.96
24	0.88	0.86	0.91	0.96	1.03	0.90	0.96
25	0.88	0.86	0.91	0.96	1.03	0.90	0.96
26	0.88	0.85	0.91	0.98	1.03	0.90	0.98
27	0.88	0.85	0.91	0.98	1.02	0.90	0.98
28	0.88	0.85	0.91	1.00	1.02	0.90	1.00
29	0.88	0.85	0.91	1.02	1.02	0.90	1.02
30	0.88	0.85	0.91	1.02	1.01	0.90	1.02
31	0.88	0.84	0.91	1.06	1.00	0.90	1.06
32	0.88	0.84	0.91	1.06	1.00	0.90	1.06
33	0.88	0.84	0.92	1.06	1.00	0.90	1.06
34	0.88	0.84	0.92	1.07	1.00	0.90	1.07
35	0.88	0.84	0.92	1.07	1.00	0.89	1.07
36	0.88	0.84	0.92	1.07	0.98	0.89	1.07

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	0.88	0.84	0.92	1.07	0.98	0.89	1.07
38	0.88	0.85	0.92	1.07	0.98	0.89	1.07
39	0.88	0.85	0.92	1.10	0.96	0.89	1.10
40	0.88	0.85	0.92	1.10	0.96	0.89	1.10
41	0.88	0.85	0.92	1.10	0.96	0.89	1.10
42	0.88	0.85	0.92	1.11	0.94	0.89	1.11
43	0.89	0.85	0.92	1.12	0.94	0.89	1.12
44	0.89	0.85	0.92	1.12	0.94	0.89	1.12
45	0.89	0.85	0.92	1.12	0.92	0.89	1.12
46	0.90	0.85	0.93	1.12	0.92	0.89	1.12
47	0.92	0.85	0.93	1.12	0.92	0.89	1.12
48	0.93	0.86	0.93	1.12	0.91	0.89	1.12
49	0.94	0.88	0.93	1.12	0.91	0.91	1.12
50	0.94	0.89	0.94	1.12	0.91	0.91	1.12
51	0.95	0.91	0.94	1.12	0.91	0.92	1.12
52	0.96	0.93	0.95	1.12	0.89	0.93	1.12
53	0.99	0.94	0.95	1.12	0.89	0.94	1.12
54	1.02	0.96	0.96	1.12	0.89	0.94	1.12
55	1.03	0.99	0.97	1.12	0.89	0.95	1.12
56	1.06	1.02	1.01	1.13	0.86	0.97	1.13
57	1.09	1.04	1.05	1.13	0.86	0.99	1.13
58	1.12	1.07	1.08	1.13	0.86	1.01	1.13
59	1.14	1.10	1.13	1.13	0.86	1.04	1.13
60	1.19	1.13	1.16	1.13	0.86	1.07	1.13
61	1.22	1.18	1.19	1.13	0.86	1.11	1.13
62	1.26	1.19	1.21	1.13	0.86	1.15	1.13
63	1.30	1.20	1.27	1.13	0.86	1.19	1.13
64	1.33	1.25	1.31	1.13	0.86	1.20	1.13
65	1.37	1.30	1.31	1.13	0.86	1.22	1.13
66	1.40	1.33	1.31	1.13	0.86	1.22	1.13
67	1.43	1.35	1.31	1.13	0.86	1.24	1.13
68	1.46	1.36	1.31	1.13	0.86	1.25	1.13
69	1.48	1.37	1.31	1.13	0.86	1.25	1.13
70	1.50	1.41	1.31	1.13	0.86	1.27	1.13
71	1.52	1.42	1.31	1.13	0.86	1.29	1.13
72+	1.53	1.45	1.31	1.19	0.86	1.33	1.19
Excess Vehicle	0.80	0.80	0.80	0.70	0.95	0.90	0.70

State: **CALIFORNIA**
 Line of Business: **AUTO**
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DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	2.21	2.13	1.68	1.19	1.08	1.93	1.19
1	2.01	1.77	1.55	1.19	1.11	1.72	1.19
2	1.79	1.60	1.44	1.16	1.14	1.59	1.16
3	1.58	1.56	1.36	1.12	1.17	1.51	1.12
4	1.46	1.54	1.34	1.09	1.20	1.45	1.09
5	1.35	1.52	1.31	1.04	1.22	1.38	1.04
6	1.23	1.49	1.16	0.99	1.22	1.31	0.99
7	1.18	1.34	1.16	0.95	1.21	1.25	0.95
8	1.12	1.21	1.08	0.91	1.21	1.19	0.91
9	1.06	1.10	1.08	0.91	1.20	1.14	0.91
10	1.03	1.00	1.08	0.91	1.20	1.09	0.91
11	0.98	0.98	1.05	0.91	1.18	1.04	0.91
12	0.96	0.96	1.03	0.91	1.16	1.03	0.91
13	0.94	0.94	1.03	0.91	1.14	1.02	0.91
14	0.92	0.92	1.03	0.91	1.11	1.00	0.91
15	0.92	0.91	1.03	0.91	1.09	0.98	0.91
16	0.91	0.91	1.03	0.91	1.08	0.97	0.91
17	0.91	0.90	1.03	0.91	1.07	0.96	0.91
18	0.91	0.90	1.03	0.91	1.06	0.95	0.91
19	0.91	0.90	1.03	0.91	1.05	0.94	0.91
20	0.91	0.90	1.03	0.95	1.04	0.93	0.95
21	0.91	0.90	1.03	0.95	1.02	0.93	0.95
22	0.91	0.89	1.03	0.95	1.01	0.93	0.95
23	0.91	0.89	0.99	0.95	1.00	0.92	0.95
24	0.91	0.89	0.96	0.95	0.99	0.92	0.95
25	0.91	0.89	0.94	0.99	0.99	0.92	0.99
26	0.91	0.88	0.94	0.99	0.99	0.92	0.99
27	0.91	0.88	0.94	0.99	0.98	0.92	0.99
28	0.91	0.88	0.94	0.99	0.98	0.92	0.99
29	0.91	0.88	0.94	0.99	0.98	0.92	0.99
30	0.91	0.88	0.94	0.99	0.98	0.92	0.99
31	0.91	0.86	0.94	1.09	0.97	0.92	1.09
32	0.91	0.86	0.94	1.09	0.97	0.92	1.09
33	0.91	0.86	0.94	1.09	0.97	0.92	1.09
34	0.91	0.86	0.94	1.09	0.97	0.92	1.09
35	0.91	0.86	0.94	1.09	0.97	0.91	1.09
36	0.91	0.86	0.94	1.12	0.96	0.91	1.12

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	0.91	0.86	0.94	1.12	0.96	0.91	1.12
38	0.91	0.88	0.94	1.12	0.96	0.91	1.12
39	0.91	0.88	0.94	1.12	0.94	0.91	1.12
40	0.91	0.88	0.94	1.12	0.94	0.91	1.12
41	0.91	0.88	0.94	1.12	0.94	0.91	1.12
42	0.91	0.88	0.94	1.12	0.93	0.91	1.12
43	0.92	0.88	0.94	1.12	0.93	0.91	1.12
44	0.92	0.88	0.94	1.12	0.93	0.91	1.12
45	0.92	0.88	0.94	1.19	0.91	0.91	1.19
46	0.94	0.88	0.94	1.19	0.91	0.91	1.19
47	0.96	0.88	0.94	1.19	0.91	0.91	1.19
48	0.97	0.89	0.94	1.19	0.90	0.91	1.19
49	0.98	0.91	0.94	1.19	0.90	0.93	1.19
50	0.98	0.92	0.95	1.19	0.90	0.93	1.19
51	1.00	0.94	0.96	1.19	0.90	0.94	1.19
52	1.01	0.96	0.97	1.19	0.88	0.95	1.19
53	1.04	0.98	0.99	1.19	0.88	0.96	1.19
54	1.07	1.00	1.00	1.19	0.88	0.97	1.19
55	1.08	1.03	1.03	1.19	0.88	0.98	1.19
56	1.12	1.07	1.05	1.19	0.86	1.01	1.19
57	1.15	1.09	1.11	1.19	0.86	1.03	1.19
58	1.18	1.11	1.16	1.19	0.86	1.05	1.19
59	1.22	1.15	1.22	1.19	0.86	1.08	1.19
60	1.27	1.18	1.29	1.19	0.86	1.12	1.19
61	1.30	1.23	1.35	1.19	0.86	1.16	1.19
62	1.35	1.24	1.42	1.19	0.86	1.20	1.19
63	1.39	1.26	1.50	1.19	0.86	1.24	1.19
64	1.43	1.31	1.55	1.25	0.86	1.25	1.25
65	1.48	1.36	1.55	1.25	0.86	1.27	1.25
66	1.51	1.39	1.56	1.25	0.86	1.27	1.25
67	1.55	1.41	1.56	1.25	0.86	1.29	1.25
68	1.58	1.43	1.56	1.25	0.86	1.30	1.25
69	1.60	1.44	1.56	1.25	0.86	1.31	1.25
70	1.62	1.48	1.56	1.25	0.86	1.33	1.25
71	1.65	1.49	1.56	1.25	0.86	1.36	1.25
72+	1.66	1.53	1.56	1.32	0.86	1.40	1.32
Excess Vehicle	0.80	0.80	0.80	0.70	0.95	0.90	0.70

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
GIC

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	2.08	1.63	1.46	1.24	1.00	1.58	1.24
1	1.81	1.48	1.42	1.24	1.02	1.48	1.24
2	1.61	1.33	1.39	1.24	1.04	1.43	1.24
3	1.45	1.32	1.35	1.17	1.07	1.40	1.17
4	1.35	1.30	1.31	1.07	1.10	1.34	1.07
5	1.30	1.26	1.26	1.07	1.11	1.32	1.07
6	1.24	1.21	1.20	1.01	1.11	1.29	1.01
7	1.12	1.13	1.18	1.01	1.10	1.25	1.01
8	1.07	1.10	1.15	0.94	1.10	1.19	0.94
9	1.02	1.02	1.09	0.94	1.08	1.16	0.94
10	0.99	1.00	1.04	0.94	1.08	1.09	0.94
11	0.95	0.97	1.01	0.94	1.07	1.03	0.94
12	0.91	0.93	0.98	0.94	1.06	0.98	0.94
13	0.90	0.90	0.95	0.94	1.04	0.96	0.94
14	0.89	0.85	0.93	0.94	1.02	0.95	0.94
15	0.88	0.83	0.93	0.94	1.00	0.93	0.94
16	0.87	0.83	0.93	0.94	0.99	0.91	0.94
17	0.87	0.82	0.93	0.98	0.97	0.89	0.98
18	0.86	0.82	0.93	0.98	0.96	0.89	0.98
19	0.86	0.82	0.93	0.98	0.96	0.89	0.98
20	0.86	0.82	0.93	0.98	0.95	0.89	0.98
21	0.86	0.82	0.93	0.98	0.93	0.89	0.98
22	0.86	0.81	0.93	0.98	0.93	0.89	0.98
23	0.86	0.81	0.93	0.99	0.92	0.89	0.99
24	0.86	0.81	0.93	0.99	0.91	0.89	0.99
25	0.86	0.81	0.93	0.99	0.91	0.89	0.99
26	0.86	0.81	0.93	1.02	0.91	0.89	1.02
27	0.85	0.81	0.93	1.02	0.90	0.88	1.02
28	0.84	0.81	0.93	1.05	0.90	0.88	1.05
29	0.83	0.81	0.93	1.07	0.90	0.88	1.07
30	0.82	0.81	0.93	1.07	0.89	0.88	1.07
31	0.82	0.80	0.93	1.12	0.89	0.88	1.12
32	0.82	0.80	0.93	1.12	0.89	0.88	1.12
33	0.82	0.80	0.93	1.12	0.89	0.88	1.12
34	0.82	0.80	0.93	1.14	0.89	0.88	1.14
35	0.82	0.80	0.93	1.14	0.89	0.88	1.14
36	0.82	0.80	0.93	1.14	0.88	0.88	1.14

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
GIC

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	0.82	0.80	0.93	1.14	0.88	0.88	1.14
38	0.82	0.80	0.93	1.14	0.88	0.88	1.14
39	0.82	0.80	0.93	1.18	0.87	0.87	1.18
40	0.82	0.77	0.93	1.18	0.87	0.87	1.18
41	0.82	0.77	0.91	1.18	0.87	0.87	1.18
42	0.82	0.77	0.91	1.19	0.85	0.87	1.19
43	0.82	0.77	0.91	1.20	0.85	0.87	1.20
44	0.82	0.77	0.91	1.20	0.85	0.87	1.20
45	0.82	0.77	0.91	1.20	0.84	0.86	1.20
46	0.82	0.77	0.91	1.20	0.84	0.86	1.20
47	0.82	0.77	0.91	1.20	0.84	0.86	1.20
48	0.82	0.77	0.91	1.20	0.83	0.86	1.20
49	0.83	0.77	0.91	1.20	0.83	0.86	1.20
50	0.84	0.77	0.93	1.20	0.83	0.86	1.20
51	0.85	0.78	0.93	1.20	0.83	0.87	1.20
52	0.86	0.79	0.93	1.20	0.82	0.88	1.20
53	0.87	0.80	0.93	1.20	0.82	0.88	1.20
54	0.89	0.81	0.95	1.20	0.82	0.89	1.20
55	0.92	0.82	0.98	1.20	0.82	0.90	1.20
56	0.95	0.82	1.01	1.21	0.80	0.90	1.21
57	0.98	0.85	1.04	1.21	0.80	0.92	1.21
58	1.01	0.88	1.06	1.21	0.80	0.93	1.21
59	1.04	0.91	1.09	1.21	0.80	0.95	1.21
60	1.06	0.94	1.12	1.21	0.80	0.96	1.21
61	1.08	0.97	1.15	1.21	0.80	0.96	1.21
62	1.09	0.97	1.18	1.21	0.80	0.98	1.21
63	1.10	0.97	1.20	1.21	0.80	0.99	1.21
64	1.11	1.00	1.23	1.21	0.80	1.01	1.21
65	1.11	1.00	1.23	1.21	0.80	1.02	1.21
66	1.12	1.04	1.23	1.21	0.80	1.03	1.21
67	1.13	1.04	1.23	1.21	0.80	1.05	1.21
68	1.14	1.07	1.23	1.21	0.80	1.06	1.21
69	1.15	1.07	1.23	1.21	0.80	1.08	1.21
70	1.16	1.11	1.23	1.21	0.80	1.09	1.21
71	1.17	1.11	1.23	1.21	0.80	1.09	1.21
72+	1.19	1.19	1.23	1.30	0.80	1.12	1.30
Excess Vehicle	0.80	0.80	0.80	0.70	0.95	0.90	0.70

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
Garrison

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	2.07	1.80	1.61	1.24	1.07	1.77	1.24
1	1.89	1.54	1.50	1.22	1.09	1.58	1.22
2	1.69	1.41	1.40	1.18	1.11	1.48	1.18
3	1.51	1.38	1.35	1.15	1.13	1.41	1.15
4	1.41	1.36	1.32	1.10	1.16	1.35	1.10
5	1.30	1.34	1.29	1.10	1.17	1.29	1.10
6	1.19	1.32	1.16	1.02	1.17	1.23	1.02
7	1.16	1.20	1.16	1.02	1.17	1.18	1.02
8	1.10	1.11	1.11	0.94	1.16	1.13	0.94
9	1.05	1.04	1.01	0.94	1.15	1.09	0.94
10	1.02	0.96	1.01	0.94	1.15	1.04	0.94
11	0.97	0.94	1.01	0.94	1.14	1.00	0.94
12	0.95	0.93	1.01	0.94	1.13	0.99	0.94
13	0.93	0.92	0.96	0.94	1.11	0.98	0.94
14	0.92	0.90	0.96	0.94	1.09	0.96	0.94
15	0.92	0.90	0.96	0.94	1.07	0.95	0.94
16	0.91	0.90	0.96	0.94	1.06	0.94	0.94
17	0.91	0.89	0.96	0.99	1.06	0.93	0.99
18	0.91	0.89	0.96	0.99	1.05	0.92	0.99
19	0.91	0.89	0.96	0.99	1.04	0.91	0.99
20	0.91	0.89	0.96	0.99	1.03	0.90	0.99
21	0.91	0.89	0.95	0.99	1.02	0.90	0.99
22	0.91	0.88	0.93	0.99	1.01	0.90	0.99
23	0.91	0.88	0.90	1.00	1.01	0.90	1.00
24	0.91	0.88	0.90	1.00	1.00	0.90	1.00
25	0.91	0.88	0.90	1.00	1.00	0.90	1.00
26	0.91	0.87	0.90	1.03	1.00	0.90	1.03
27	0.91	0.87	0.90	1.03	0.99	0.90	1.03
28	0.91	0.87	0.90	1.07	0.99	0.90	1.07
29	0.91	0.87	0.90	1.10	0.99	0.90	1.10
30	0.91	0.87	0.90	1.10	0.99	0.90	1.10
31	0.91	0.86	0.90	1.16	0.98	0.90	1.16
32	0.91	0.86	0.90	1.16	0.98	0.90	1.16
33	0.91	0.86	0.91	1.16	0.98	0.90	1.16
34	0.91	0.86	0.91	1.18	0.98	0.90	1.18
35	0.91	0.86	0.91	1.18	0.98	0.89	1.18
36	0.91	0.86	0.91	1.18	0.97	0.89	1.18

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
Garrison

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	0.91	0.86	0.91	1.18	0.97	0.89	1.18
38	0.91	0.87	0.93	1.18	0.97	0.89	1.18
39	0.91	0.87	0.93	1.22	0.96	0.89	1.22
40	0.91	0.87	0.93	1.22	0.96	0.89	1.22
41	0.91	0.87	0.93	1.22	0.96	0.89	1.22
42	0.91	0.87	0.93	1.24	0.95	0.89	1.24
43	0.92	0.87	0.93	1.25	0.95	0.89	1.25
44	0.92	0.87	0.93	1.25	0.95	0.89	1.25
45	0.92	0.87	0.93	1.25	0.94	0.89	1.25
46	0.93	0.87	0.94	1.25	0.94	0.89	1.25
47	0.95	0.87	0.94	1.25	0.94	0.89	1.25
48	0.96	0.88	0.94	1.25	0.94	0.89	1.25
49	0.97	0.90	0.94	1.25	0.94	0.90	1.25
50	0.97	0.90	0.95	1.25	0.94	0.90	1.25
51	0.98	0.92	0.95	1.25	0.94	0.91	1.25
52	0.99	0.93	0.96	1.25	0.92	0.92	1.25
53	1.03	0.94	0.96	1.25	0.92	0.93	1.25
54	1.06	0.96	0.98	1.25	0.92	0.94	1.25
55	1.07	0.98	0.99	1.25	0.92	0.95	1.25
56	1.10	1.01	1.04	1.25	0.91	0.97	1.25
57	1.13	1.03	1.09	1.25	0.91	0.99	1.25
58	1.16	1.05	1.14	1.25	0.91	1.00	1.25
59	1.18	1.08	1.21	1.25	0.91	1.03	1.25
60	1.23	1.10	1.25	1.25	0.91	1.07	1.25
61	1.26	1.13	1.29	1.25	0.91	1.10	1.25
62	1.30	1.14	1.34	1.25	0.91	1.13	1.25
63	1.34	1.16	1.42	1.25	0.91	1.17	1.25
64	1.37	1.19	1.47	1.25	0.91	1.18	1.25
65	1.42	1.23	1.47	1.25	0.91	1.19	1.25
66	1.45	1.25	1.47	1.25	0.91	1.19	1.25
67	1.48	1.26	1.47	1.25	0.91	1.21	1.25
68	1.51	1.28	1.47	1.25	0.91	1.22	1.25
69	1.53	1.29	1.47	1.25	0.91	1.23	1.25
70	1.55	1.31	1.47	1.25	0.91	1.25	1.25
71	1.57	1.32	1.47	1.25	0.91	1.27	1.25
72+	1.58	1.36	1.47	1.34	0.91	1.30	1.34
Excess Vehicle	0.80	0.80	0.80	0.70	1.00	0.90	0.70

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA
Female

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.05	0.96	1.24	1.20	0.95	0.95	1.20
1	1.05	0.96	1.24	1.20	0.95	0.97	1.20
2	1.05	0.96	1.24	1.20	0.95	0.99	1.20
3	1.05	1.00	1.24	1.20	0.95	1.01	1.20
4	1.05	1.01	1.24	1.20	0.95	1.03	1.20
5	1.05	1.02	1.25	1.20	0.95	1.05	1.20
6	1.05	1.03	1.25	1.20	0.95	1.07	1.20
7	1.05	1.04	1.25	1.20	0.95	1.07	1.20
8	1.05	1.05	1.25	1.20	0.95	1.07	1.20
9	1.05	1.06	1.25	1.20	0.95	1.07	1.20
10	1.05	1.06	1.25	1.20	0.95	1.07	1.20
11	1.05	1.06	1.25	1.20	0.95	1.07	1.20
12	1.05	1.06	1.25	1.20	0.95	1.07	1.20
13	1.05	1.06	1.25	1.20	0.94	1.07	1.20
14	1.05	1.06	1.25	1.20	0.94	1.07	1.20
15	1.05	1.06	1.25	1.20	0.94	1.07	1.20
16	1.05	1.06	1.25	1.20	0.94	1.07	1.20
17	1.05	1.06	1.25	1.20	0.94	1.07	1.20
18	1.05	1.06	1.25	1.20	0.94	1.07	1.20
19	1.05	1.06	1.25	1.20	0.93	1.07	1.20
20	1.05	1.06	1.25	1.20	0.93	1.07	1.20
21	1.05	1.06	1.25	1.20	0.92	1.07	1.20
22	1.05	1.06	1.25	1.20	0.92	1.07	1.20
23	1.05	1.06	1.25	1.20	0.91	1.07	1.20
24	1.05	1.06	1.25	1.20	0.91	1.07	1.20
25	1.05	1.06	1.25	1.20	0.90	1.07	1.20
26	1.05	1.06	1.25	1.20	0.90	1.07	1.20
27	1.05	1.06	1.25	1.20	0.90	1.07	1.20
28	1.05	1.06	1.25	1.20	0.90	1.07	1.20
29	1.05	1.06	1.25	1.20	0.89	1.07	1.20
30	1.05	1.06	1.25	1.20	0.89	1.07	1.20
31	1.05	1.06	1.25	1.20	0.89	1.07	1.20
32	1.05	1.06	1.25	1.20	0.89	1.07	1.20
33	1.05	1.06	1.24	1.20	0.88	1.05	1.20
34	1.05	1.06	1.24	1.20	0.88	1.05	1.20
35	1.05	1.05	1.24	1.20	0.88	1.03	1.20
36	1.04	1.04	1.24	1.19	0.87	1.03	1.19

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA
Female

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.03	1.03	1.24	1.18	0.87	1.01	1.18
38	1.02	1.02	1.23	1.17	0.86	1.01	1.17
39	1.01	1.01	1.23	1.16	0.86	1.00	1.16
40	1.00	1.00	1.23	1.15	0.86	1.00	1.15
41	1.00	1.00	1.21	1.14	0.86	1.00	1.14
42	1.00	1.00	1.21	1.13	0.86	1.00	1.13
43	1.00	1.00	1.21	1.12	0.86	1.00	1.12
44	1.00	1.00	1.21	1.11	0.86	1.00	1.11
45	1.00	1.00	1.19	1.10	0.86	1.00	1.10
46	1.00	1.00	1.19	1.09	0.86	1.00	1.09
47	1.00	1.00	1.19	1.08	0.86	1.00	1.08
48	1.00	1.00	1.18	1.07	0.86	1.00	1.07
49	1.00	1.00	1.16	1.06	0.86	1.00	1.06
50	1.00	1.00	1.16	1.05	0.86	1.00	1.05
51	1.00	1.00	1.14	1.04	0.86	1.00	1.04
52	1.00	1.00	1.14	1.03	0.86	1.00	1.03
53	1.00	1.00	1.12	1.02	0.86	1.00	1.02
54	1.00	1.00	1.10	1.01	0.86	1.00	1.01
55	1.00	1.00	1.10	1.00	0.86	1.00	1.00
56	1.00	1.00	1.10	0.99	0.86	1.00	0.99
57	1.00	1.00	1.08	0.99	0.86	1.00	0.99
58	1.00	1.00	1.08	0.98	0.86	1.00	0.98
59	1.00	1.00	1.08	0.98	0.86	1.00	0.98
60	1.00	1.00	1.08	0.97	0.86	1.00	0.97
61	1.00	1.00	1.08	0.97	0.86	1.00	0.97
62	1.00	1.00	1.08	0.96	0.86	1.00	0.96
63	1.00	1.00	1.08	0.96	0.86	1.00	0.96
64	1.00	1.00	1.07	0.95	0.86	1.00	0.95
65	1.00	1.00	1.07	0.95	0.86	1.00	0.95
66	1.00	1.00	1.07	0.94	0.86	1.00	0.94
67	1.00	1.00	1.07	0.94	0.86	1.00	0.94
68	1.00	1.00	1.07	0.93	0.86	1.00	0.93
69	1.00	1.00	1.07	0.93	0.86	1.00	0.93
70	1.00	1.00	1.07	0.92	0.86	1.00	0.92
71	1.00	1.00	1.07	0.92	0.86	1.00	0.92
72+	1.00	1.00	1.07	0.91	0.86	1.00	0.91
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC
Female

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.05	0.96	1.24	1.20	0.95	0.95	1.20
1	1.05	0.96	1.24	1.20	0.95	0.97	1.20
2	1.05	0.96	1.24	1.20	0.95	0.99	1.20
3	1.05	1.00	1.24	1.20	0.95	1.01	1.20
4	1.05	1.01	1.24	1.20	0.95	1.03	1.20
5	1.05	1.02	1.25	1.20	0.95	1.05	1.20
6	1.05	1.03	1.25	1.20	0.95	1.07	1.20
7	1.05	1.04	1.25	1.20	0.95	1.07	1.20
8	1.05	1.05	1.25	1.20	0.95	1.07	1.20
9	1.05	1.06	1.25	1.20	0.95	1.07	1.20
10	1.05	1.06	1.25	1.20	0.95	1.07	1.20
11	1.05	1.06	1.25	1.20	0.95	1.07	1.20
12	1.05	1.06	1.25	1.20	0.95	1.07	1.20
13	1.05	1.06	1.25	1.20	0.94	1.07	1.20
14	1.05	1.06	1.25	1.20	0.94	1.07	1.20
15	1.05	1.06	1.25	1.20	0.94	1.07	1.20
16	1.05	1.06	1.25	1.20	0.94	1.07	1.20
17	1.05	1.06	1.25	1.20	0.94	1.07	1.20
18	1.05	1.06	1.25	1.20	0.94	1.07	1.20
19	1.05	1.06	1.25	1.20	0.93	1.07	1.20
20	1.05	1.06	1.25	1.20	0.93	1.07	1.20
21	1.05	1.06	1.25	1.20	0.92	1.07	1.20
22	1.05	1.06	1.25	1.20	0.92	1.07	1.20
23	1.05	1.06	1.25	1.20	0.91	1.07	1.20
24	1.05	1.06	1.25	1.20	0.91	1.07	1.20
25	1.05	1.06	1.25	1.20	0.90	1.07	1.20
26	1.05	1.06	1.25	1.20	0.90	1.07	1.20
27	1.05	1.06	1.25	1.20	0.90	1.07	1.20
28	1.05	1.06	1.25	1.20	0.90	1.07	1.20
29	1.05	1.06	1.25	1.20	0.89	1.07	1.20
30	1.05	1.06	1.25	1.20	0.89	1.07	1.20
31	1.05	1.06	1.25	1.20	0.89	1.07	1.20
32	1.05	1.06	1.25	1.20	0.89	1.07	1.20
33	1.05	1.06	1.24	1.20	0.88	1.05	1.20
34	1.05	1.06	1.24	1.20	0.88	1.05	1.20
35	1.05	1.05	1.24	1.20	0.88	1.03	1.20
36	1.04	1.04	1.24	1.19	0.87	1.03	1.19

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC
Female

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.03	1.03	1.24	1.18	0.87	1.01	1.18
38	1.02	1.02	1.23	1.17	0.86	1.01	1.17
39	1.01	1.01	1.23	1.16	0.86	1.00	1.16
40	1.00	1.00	1.23	1.15	0.86	1.00	1.15
41	1.00	1.00	1.21	1.14	0.86	1.00	1.14
42	1.00	1.00	1.21	1.13	0.86	1.00	1.13
43	1.00	1.00	1.21	1.12	0.86	1.00	1.12
44	1.00	1.00	1.21	1.11	0.86	1.00	1.11
45	1.00	1.00	1.19	1.10	0.86	1.00	1.10
46	1.00	1.00	1.19	1.09	0.86	1.00	1.09
47	1.00	1.00	1.19	1.08	0.86	1.00	1.08
48	1.00	1.00	1.18	1.07	0.86	1.00	1.07
49	1.00	1.00	1.16	1.06	0.86	1.00	1.06
50	1.00	1.00	1.16	1.05	0.86	1.00	1.05
51	1.00	1.00	1.14	1.04	0.86	1.00	1.04
52	1.00	1.00	1.14	1.03	0.86	1.00	1.03
53	1.00	1.00	1.12	1.02	0.86	1.00	1.02
54	1.00	1.00	1.10	1.01	0.86	1.00	1.01
55	1.00	1.00	1.10	1.00	0.86	1.00	1.00
56	1.00	1.00	1.10	0.99	0.86	1.00	0.99
57	1.00	1.00	1.08	0.99	0.86	1.00	0.99
58	1.00	1.00	1.08	0.98	0.86	1.00	0.98
59	1.00	1.00	1.08	0.98	0.86	1.00	0.98
60	1.00	1.00	1.08	0.97	0.86	1.00	0.97
61	1.00	1.00	1.08	0.97	0.86	1.00	0.97
62	1.00	1.00	1.08	0.96	0.86	1.00	0.96
63	1.00	1.00	1.08	0.96	0.86	1.00	0.96
64	1.00	1.00	1.07	0.95	0.86	1.00	0.95
65	1.00	1.00	1.07	0.95	0.86	1.00	0.95
66	1.00	1.00	1.07	0.94	0.86	1.00	0.94
67	1.00	1.00	1.07	0.94	0.86	1.00	0.94
68	1.00	1.00	1.07	0.93	0.86	1.00	0.93
69	1.00	1.00	1.07	0.93	0.86	1.00	0.93
70	1.00	1.00	1.07	0.92	0.86	1.00	0.92
71	1.00	1.00	1.07	0.92	0.86	1.00	0.92
72+	1.00	1.00	1.07	0.91	0.86	1.00	0.91
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
GIC
Female

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.05	0.96	1.24	1.20	0.95	0.95	1.20
1	1.05	0.96	1.24	1.20	0.95	0.97	1.20
2	1.05	0.96	1.24	1.20	0.95	0.99	1.20
3	1.05	1.00	1.24	1.20	0.95	1.01	1.20
4	1.05	1.01	1.24	1.20	0.95	1.03	1.20
5	1.05	1.02	1.25	1.20	0.95	1.05	1.20
6	1.05	1.03	1.25	1.20	0.95	1.07	1.20
7	1.05	1.04	1.25	1.20	0.95	1.07	1.20
8	1.05	1.05	1.25	1.20	0.95	1.07	1.20
9	1.05	1.06	1.25	1.20	0.95	1.07	1.20
10	1.05	1.06	1.25	1.20	0.95	1.07	1.20
11	1.05	1.06	1.25	1.20	0.95	1.07	1.20
12	1.05	1.06	1.25	1.20	0.95	1.07	1.20
13	1.05	1.06	1.25	1.20	0.94	1.07	1.20
14	1.05	1.06	1.25	1.20	0.94	1.07	1.20
15	1.05	1.06	1.25	1.20	0.94	1.07	1.20
16	1.05	1.06	1.25	1.20	0.94	1.07	1.20
17	1.05	1.06	1.25	1.20	0.94	1.07	1.20
18	1.05	1.06	1.25	1.20	0.94	1.07	1.20
19	1.05	1.06	1.25	1.20	0.93	1.07	1.20
20	1.05	1.06	1.25	1.20	0.93	1.07	1.20
21	1.05	1.06	1.25	1.20	0.92	1.07	1.20
22	1.05	1.06	1.25	1.20	0.92	1.07	1.20
23	1.05	1.06	1.25	1.20	0.91	1.07	1.20
24	1.05	1.06	1.25	1.20	0.91	1.07	1.20
25	1.05	1.06	1.25	1.20	0.90	1.07	1.20
26	1.05	1.06	1.25	1.20	0.90	1.07	1.20
27	1.05	1.06	1.25	1.20	0.90	1.07	1.20
28	1.05	1.06	1.25	1.20	0.90	1.07	1.20
29	1.05	1.06	1.25	1.20	0.89	1.07	1.20
30	1.05	1.06	1.25	1.20	0.89	1.07	1.20
31	1.05	1.06	1.25	1.20	0.89	1.07	1.20
32	1.05	1.06	1.25	1.20	0.89	1.07	1.20
33	1.05	1.06	1.24	1.20	0.88	1.05	1.20
34	1.05	1.06	1.24	1.20	0.88	1.05	1.20
35	1.05	1.05	1.24	1.20	0.88	1.03	1.20
36	1.04	1.04	1.24	1.19	0.87	1.03	1.19

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience

GIC
Female

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.03	1.03	1.24	1.18	0.87	1.01	1.18
38	1.02	1.02	1.23	1.17	0.86	1.01	1.17
39	1.01	1.01	1.23	1.16	0.86	1.00	1.16
40	1.00	1.00	1.23	1.15	0.86	1.00	1.15
41	1.00	1.00	1.21	1.14	0.86	1.00	1.14
42	1.00	1.00	1.21	1.13	0.86	1.00	1.13
43	1.00	1.00	1.21	1.12	0.86	1.00	1.12
44	1.00	1.00	1.21	1.11	0.86	1.00	1.11
45	1.00	1.00	1.19	1.10	0.86	1.00	1.10
46	1.00	1.00	1.19	1.09	0.86	1.00	1.09
47	1.00	1.00	1.19	1.08	0.86	1.00	1.08
48	1.00	1.00	1.18	1.07	0.86	1.00	1.07
49	1.00	1.00	1.16	1.06	0.86	1.00	1.06
50	1.00	1.00	1.16	1.05	0.86	1.00	1.05
51	1.00	1.00	1.14	1.04	0.86	1.00	1.04
52	1.00	1.00	1.14	1.03	0.86	1.00	1.03
53	1.00	1.00	1.12	1.02	0.86	1.00	1.02
54	1.00	1.00	1.10	1.01	0.86	1.00	1.01
55	1.00	1.00	1.10	1.00	0.86	1.00	1.00
56	1.00	1.00	1.10	0.99	0.86	1.00	0.99
57	1.00	1.00	1.08	0.99	0.86	1.00	0.99
58	1.00	1.00	1.08	0.98	0.86	1.00	0.98
59	1.00	1.00	1.08	0.98	0.86	1.00	0.98
60	1.00	1.00	1.08	0.97	0.86	1.00	0.97
61	1.00	1.00	1.08	0.97	0.86	1.00	0.97
62	1.00	1.00	1.08	0.96	0.86	1.00	0.96
63	1.00	1.00	1.08	0.96	0.86	1.00	0.96
64	1.00	1.00	1.07	0.95	0.86	1.00	0.95
65	1.00	1.00	1.07	0.95	0.86	1.00	0.95
66	1.00	1.00	1.07	0.94	0.86	1.00	0.94
67	1.00	1.00	1.07	0.94	0.86	1.00	0.94
68	1.00	1.00	1.07	0.93	0.86	1.00	0.93
69	1.00	1.00	1.07	0.93	0.86	1.00	0.93
70	1.00	1.00	1.07	0.92	0.86	1.00	0.92
71	1.00	1.00	1.07	0.92	0.86	1.00	0.92
72+	1.00	1.00	1.07	0.91	0.86	1.00	0.91
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience

Garrison

Female

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.05	0.96	1.24	1.20	0.95	0.95	1.20
1	1.05	0.96	1.24	1.20	0.95	0.97	1.20
2	1.05	0.96	1.24	1.20	0.95	0.99	1.20
3	1.05	1.00	1.24	1.20	0.95	1.01	1.20
4	1.05	1.01	1.24	1.20	0.95	1.03	1.20
5	1.05	1.02	1.25	1.20	0.95	1.05	1.20
6	1.05	1.03	1.25	1.20	0.95	1.07	1.20
7	1.05	1.04	1.25	1.20	0.95	1.07	1.20
8	1.05	1.05	1.25	1.20	0.95	1.07	1.20
9	1.05	1.06	1.25	1.20	0.95	1.07	1.20
10	1.05	1.06	1.25	1.20	0.95	1.07	1.20
11	1.05	1.06	1.25	1.20	0.95	1.07	1.20
12	1.05	1.06	1.25	1.20	0.95	1.07	1.20
13	1.05	1.06	1.25	1.20	0.94	1.07	1.20
14	1.05	1.06	1.25	1.20	0.94	1.07	1.20
15	1.05	1.06	1.25	1.20	0.94	1.07	1.20
16	1.05	1.06	1.25	1.20	0.94	1.07	1.20
17	1.05	1.06	1.25	1.20	0.94	1.07	1.20
18	1.05	1.06	1.25	1.20	0.94	1.07	1.20
19	1.05	1.06	1.25	1.20	0.93	1.07	1.20
20	1.05	1.06	1.25	1.20	0.93	1.07	1.20
21	1.05	1.06	1.25	1.20	0.92	1.07	1.20
22	1.05	1.06	1.25	1.20	0.92	1.07	1.20
23	1.05	1.06	1.25	1.20	0.91	1.07	1.20
24	1.05	1.06	1.25	1.20	0.91	1.07	1.20
25	1.05	1.06	1.25	1.20	0.90	1.07	1.20
26	1.05	1.06	1.25	1.20	0.90	1.07	1.20
27	1.05	1.06	1.25	1.20	0.90	1.07	1.20
28	1.05	1.06	1.25	1.20	0.90	1.07	1.20
29	1.05	1.06	1.25	1.20	0.89	1.07	1.20
30	1.05	1.06	1.25	1.20	0.89	1.07	1.20
31	1.05	1.06	1.25	1.20	0.89	1.07	1.20
32	1.05	1.06	1.25	1.20	0.89	1.07	1.20
33	1.05	1.06	1.24	1.20	0.88	1.05	1.20
34	1.05	1.06	1.24	1.20	0.88	1.05	1.20
35	1.05	1.05	1.24	1.20	0.88	1.03	1.20
36	1.04	1.04	1.24	1.19	0.87	1.03	1.19

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience

Garrison

Female

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.03	1.03	1.24	1.18	0.87	1.01	1.18
38	1.02	1.02	1.23	1.17	0.86	1.01	1.17
39	1.01	1.01	1.23	1.16	0.86	1.00	1.16
40	1.00	1.00	1.23	1.15	0.86	1.00	1.15
41	1.00	1.00	1.21	1.14	0.86	1.00	1.14
42	1.00	1.00	1.21	1.13	0.86	1.00	1.13
43	1.00	1.00	1.21	1.12	0.86	1.00	1.12
44	1.00	1.00	1.21	1.11	0.86	1.00	1.11
45	1.00	1.00	1.19	1.10	0.86	1.00	1.10
46	1.00	1.00	1.19	1.09	0.86	1.00	1.09
47	1.00	1.00	1.19	1.08	0.86	1.00	1.08
48	1.00	1.00	1.18	1.07	0.86	1.00	1.07
49	1.00	1.00	1.16	1.06	0.86	1.00	1.06
50	1.00	1.00	1.16	1.05	0.86	1.00	1.05
51	1.00	1.00	1.14	1.04	0.86	1.00	1.04
52	1.00	1.00	1.14	1.03	0.86	1.00	1.03
53	1.00	1.00	1.12	1.02	0.86	1.00	1.02
54	1.00	1.00	1.10	1.01	0.86	1.00	1.01
55	1.00	1.00	1.10	1.00	0.86	1.00	1.00
56	1.00	1.00	1.10	0.99	0.86	1.00	0.99
57	1.00	1.00	1.08	0.99	0.86	1.00	0.99
58	1.00	1.00	1.08	0.98	0.86	1.00	0.98
59	1.00	1.00	1.08	0.98	0.86	1.00	0.98
60	1.00	1.00	1.08	0.97	0.86	1.00	0.97
61	1.00	1.00	1.08	0.97	0.86	1.00	0.97
62	1.00	1.00	1.08	0.96	0.86	1.00	0.96
63	1.00	1.00	1.08	0.96	0.86	1.00	0.96
64	1.00	1.00	1.07	0.95	0.86	1.00	0.95
65	1.00	1.00	1.07	0.95	0.86	1.00	0.95
66	1.00	1.00	1.07	0.94	0.86	1.00	0.94
67	1.00	1.00	1.07	0.94	0.86	1.00	0.94
68	1.00	1.00	1.07	0.93	0.86	1.00	0.93
69	1.00	1.00	1.07	0.93	0.86	1.00	0.93
70	1.00	1.00	1.07	0.92	0.86	1.00	0.92
71	1.00	1.00	1.07	0.92	0.86	1.00	0.92
72+	1.00	1.00	1.07	0.91	0.86	1.00	0.91
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA
Male

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4	1.00	1.00	1.00	1.00	1.00	1.00	1.00
5	1.00	1.00	1.00	1.00	1.00	1.00	1.00
6	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	1.00	1.00	1.00	1.00	1.00	1.00	1.00
8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11	1.00	1.00	1.00	1.00	1.00	1.00	1.00
12	1.00	1.00	1.00	1.00	1.00	1.00	1.00
13	1.00	1.00	1.00	1.00	1.00	1.00	1.00
14	1.00	1.00	1.00	1.00	1.00	1.00	1.00
15	1.00	1.00	1.00	1.00	1.00	1.00	1.00
16	1.00	1.00	1.00	1.00	1.00	1.00	1.00
17	1.00	1.00	1.00	1.00	1.00	1.00	1.00
18	1.00	1.00	1.00	1.00	1.00	1.00	1.00
19	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20	1.00	1.00	1.00	1.00	1.00	1.00	1.00
21	1.00	1.00	1.00	1.00	1.00	1.00	1.00
22	1.00	1.00	1.00	1.00	1.00	1.00	1.00
23	1.00	1.00	1.00	1.00	1.00	1.00	1.00
24	1.00	1.00	1.00	1.00	1.00	1.00	1.00
25	1.00	1.00	1.00	1.00	1.00	1.00	1.00
26	1.00	1.00	1.00	1.00	1.00	1.00	1.00
27	1.00	1.00	1.00	1.00	1.00	1.00	1.00
28	1.00	1.00	1.00	1.00	1.00	1.00	1.00
29	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30	1.00	1.00	1.00	1.00	1.00	1.00	1.00
31	1.00	1.00	1.00	1.00	1.00	1.00	1.00
32	1.00	1.00	1.00	1.00	1.00	1.00	1.00
33	1.00	1.00	1.00	1.00	1.00	1.00	1.00
34	1.00	1.00	1.00	1.00	1.00	1.00	1.00
35	1.00	1.00	1.00	1.00	1.00	1.00	1.00
36	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA
Male

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.00	1.00	1.00	1.00	1.00	1.00	1.00
38	1.00	1.00	1.00	1.00	1.00	1.00	1.00
39	1.00	1.00	1.00	1.00	1.00	1.00	1.00
40	1.00	1.00	1.00	1.00	1.00	1.00	1.00
41	1.00	1.00	1.00	1.00	1.00	1.00	1.00
42	1.00	1.00	1.00	1.00	1.00	1.00	1.00
43	1.00	1.00	1.00	1.00	1.00	1.00	1.00
44	1.00	1.00	1.00	1.00	1.00	1.00	1.00
45	1.00	1.00	1.00	1.00	1.00	1.00	1.00
46	1.00	1.00	1.00	1.00	1.00	1.00	1.00
47	1.00	1.00	1.00	1.00	1.00	1.00	1.00
48	1.00	1.00	1.00	1.00	1.00	1.00	1.00
49	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50	1.00	1.00	1.00	1.00	1.00	1.00	1.00
51	1.00	1.00	1.00	1.00	1.00	1.00	1.00
52	1.00	1.00	1.00	1.00	1.00	1.00	1.00
53	1.00	1.00	1.00	1.00	1.00	1.00	1.00
54	1.00	1.00	1.00	1.00	1.00	1.00	1.00
55	1.00	1.00	1.00	1.00	1.00	1.00	1.00
56	1.00	1.00	1.00	1.00	1.00	1.00	1.00
57	1.00	1.00	1.00	1.00	1.00	1.00	1.00
58	1.00	1.00	1.00	1.00	1.00	1.00	1.00
59	1.00	1.00	1.00	1.00	1.00	1.00	1.00
60	1.00	1.00	1.00	1.00	1.00	1.00	1.00
61	1.00	1.00	1.00	1.00	1.00	1.00	1.00
62	1.00	1.00	1.00	1.00	1.00	1.00	1.00
63	1.00	1.00	1.00	1.00	1.00	1.00	1.00
64	1.00	1.00	1.00	1.00	1.00	1.00	1.00
65	1.00	1.00	1.00	1.00	1.00	1.00	1.00
66	1.00	1.00	1.00	1.00	1.00	1.00	1.00
67	1.00	1.00	1.00	1.00	1.00	1.00	1.00
68	1.00	1.00	1.00	1.00	1.00	1.00	1.00
69	1.00	1.00	1.00	1.00	1.00	1.00	1.00
70	1.00	1.00	1.00	1.00	1.00	1.00	1.00
71	1.00	1.00	1.00	1.00	1.00	1.00	1.00
72+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC
Male

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4	1.00	1.00	1.00	1.00	1.00	1.00	1.00
5	1.00	1.00	1.00	1.00	1.00	1.00	1.00
6	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	1.00	1.00	1.00	1.00	1.00	1.00	1.00
8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11	1.00	1.00	1.00	1.00	1.00	1.00	1.00
12	1.00	1.00	1.00	1.00	1.00	1.00	1.00
13	1.00	1.00	1.00	1.00	1.00	1.00	1.00
14	1.00	1.00	1.00	1.00	1.00	1.00	1.00
15	1.00	1.00	1.00	1.00	1.00	1.00	1.00
16	1.00	1.00	1.00	1.00	1.00	1.00	1.00
17	1.00	1.00	1.00	1.00	1.00	1.00	1.00
18	1.00	1.00	1.00	1.00	1.00	1.00	1.00
19	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20	1.00	1.00	1.00	1.00	1.00	1.00	1.00
21	1.00	1.00	1.00	1.00	1.00	1.00	1.00
22	1.00	1.00	1.00	1.00	1.00	1.00	1.00
23	1.00	1.00	1.00	1.00	1.00	1.00	1.00
24	1.00	1.00	1.00	1.00	1.00	1.00	1.00
25	1.00	1.00	1.00	1.00	1.00	1.00	1.00
26	1.00	1.00	1.00	1.00	1.00	1.00	1.00
27	1.00	1.00	1.00	1.00	1.00	1.00	1.00
28	1.00	1.00	1.00	1.00	1.00	1.00	1.00
29	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30	1.00	1.00	1.00	1.00	1.00	1.00	1.00
31	1.00	1.00	1.00	1.00	1.00	1.00	1.00
32	1.00	1.00	1.00	1.00	1.00	1.00	1.00
33	1.00	1.00	1.00	1.00	1.00	1.00	1.00
34	1.00	1.00	1.00	1.00	1.00	1.00	1.00
35	1.00	1.00	1.00	1.00	1.00	1.00	1.00
36	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC
Male

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.00	1.00	1.00	1.00	1.00	1.00	1.00
38	1.00	1.00	1.00	1.00	1.00	1.00	1.00
39	1.00	1.00	1.00	1.00	1.00	1.00	1.00
40	1.00	1.00	1.00	1.00	1.00	1.00	1.00
41	1.00	1.00	1.00	1.00	1.00	1.00	1.00
42	1.00	1.00	1.00	1.00	1.00	1.00	1.00
43	1.00	1.00	1.00	1.00	1.00	1.00	1.00
44	1.00	1.00	1.00	1.00	1.00	1.00	1.00
45	1.00	1.00	1.00	1.00	1.00	1.00	1.00
46	1.00	1.00	1.00	1.00	1.00	1.00	1.00
47	1.00	1.00	1.00	1.00	1.00	1.00	1.00
48	1.00	1.00	1.00	1.00	1.00	1.00	1.00
49	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50	1.00	1.00	1.00	1.00	1.00	1.00	1.00
51	1.00	1.00	1.00	1.00	1.00	1.00	1.00
52	1.00	1.00	1.00	1.00	1.00	1.00	1.00
53	1.00	1.00	1.00	1.00	1.00	1.00	1.00
54	1.00	1.00	1.00	1.00	1.00	1.00	1.00
55	1.00	1.00	1.00	1.00	1.00	1.00	1.00
56	1.00	1.00	1.00	1.00	1.00	1.00	1.00
57	1.00	1.00	1.00	1.00	1.00	1.00	1.00
58	1.00	1.00	1.00	1.00	1.00	1.00	1.00
59	1.00	1.00	1.00	1.00	1.00	1.00	1.00
60	1.00	1.00	1.00	1.00	1.00	1.00	1.00
61	1.00	1.00	1.00	1.00	1.00	1.00	1.00
62	1.00	1.00	1.00	1.00	1.00	1.00	1.00
63	1.00	1.00	1.00	1.00	1.00	1.00	1.00
64	1.00	1.00	1.00	1.00	1.00	1.00	1.00
65	1.00	1.00	1.00	1.00	1.00	1.00	1.00
66	1.00	1.00	1.00	1.00	1.00	1.00	1.00
67	1.00	1.00	1.00	1.00	1.00	1.00	1.00
68	1.00	1.00	1.00	1.00	1.00	1.00	1.00
69	1.00	1.00	1.00	1.00	1.00	1.00	1.00
70	1.00	1.00	1.00	1.00	1.00	1.00	1.00
71	1.00	1.00	1.00	1.00	1.00	1.00	1.00
72+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
GIC
Male

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4	1.00	1.00	1.00	1.00	1.00	1.00	1.00
5	1.00	1.00	1.00	1.00	1.00	1.00	1.00
6	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	1.00	1.00	1.00	1.00	1.00	1.00	1.00
8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11	1.00	1.00	1.00	1.00	1.00	1.00	1.00
12	1.00	1.00	1.00	1.00	1.00	1.00	1.00
13	1.00	1.00	1.00	1.00	1.00	1.00	1.00
14	1.00	1.00	1.00	1.00	1.00	1.00	1.00
15	1.00	1.00	1.00	1.00	1.00	1.00	1.00
16	1.00	1.00	1.00	1.00	1.00	1.00	1.00
17	1.00	1.00	1.00	1.00	1.00	1.00	1.00
18	1.00	1.00	1.00	1.00	1.00	1.00	1.00
19	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20	1.00	1.00	1.00	1.00	1.00	1.00	1.00
21	1.00	1.00	1.00	1.00	1.00	1.00	1.00
22	1.00	1.00	1.00	1.00	1.00	1.00	1.00
23	1.00	1.00	1.00	1.00	1.00	1.00	1.00
24	1.00	1.00	1.00	1.00	1.00	1.00	1.00
25	1.00	1.00	1.00	1.00	1.00	1.00	1.00
26	1.00	1.00	1.00	1.00	1.00	1.00	1.00
27	1.00	1.00	1.00	1.00	1.00	1.00	1.00
28	1.00	1.00	1.00	1.00	1.00	1.00	1.00
29	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30	1.00	1.00	1.00	1.00	1.00	1.00	1.00
31	1.00	1.00	1.00	1.00	1.00	1.00	1.00
32	1.00	1.00	1.00	1.00	1.00	1.00	1.00
33	1.00	1.00	1.00	1.00	1.00	1.00	1.00
34	1.00	1.00	1.00	1.00	1.00	1.00	1.00
35	1.00	1.00	1.00	1.00	1.00	1.00	1.00
36	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
GIC
Male

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.00	1.00	1.00	1.00	1.00	1.00	1.00
38	1.00	1.00	1.00	1.00	1.00	1.00	1.00
39	1.00	1.00	1.00	1.00	1.00	1.00	1.00
40	1.00	1.00	1.00	1.00	1.00	1.00	1.00
41	1.00	1.00	1.00	1.00	1.00	1.00	1.00
42	1.00	1.00	1.00	1.00	1.00	1.00	1.00
43	1.00	1.00	1.00	1.00	1.00	1.00	1.00
44	1.00	1.00	1.00	1.00	1.00	1.00	1.00
45	1.00	1.00	1.00	1.00	1.00	1.00	1.00
46	1.00	1.00	1.00	1.00	1.00	1.00	1.00
47	1.00	1.00	1.00	1.00	1.00	1.00	1.00
48	1.00	1.00	1.00	1.00	1.00	1.00	1.00
49	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50	1.00	1.00	1.00	1.00	1.00	1.00	1.00
51	1.00	1.00	1.00	1.00	1.00	1.00	1.00
52	1.00	1.00	1.00	1.00	1.00	1.00	1.00
53	1.00	1.00	1.00	1.00	1.00	1.00	1.00
54	1.00	1.00	1.00	1.00	1.00	1.00	1.00
55	1.00	1.00	1.00	1.00	1.00	1.00	1.00
56	1.00	1.00	1.00	1.00	1.00	1.00	1.00
57	1.00	1.00	1.00	1.00	1.00	1.00	1.00
58	1.00	1.00	1.00	1.00	1.00	1.00	1.00
59	1.00	1.00	1.00	1.00	1.00	1.00	1.00
60	1.00	1.00	1.00	1.00	1.00	1.00	1.00
61	1.00	1.00	1.00	1.00	1.00	1.00	1.00
62	1.00	1.00	1.00	1.00	1.00	1.00	1.00
63	1.00	1.00	1.00	1.00	1.00	1.00	1.00
64	1.00	1.00	1.00	1.00	1.00	1.00	1.00
65	1.00	1.00	1.00	1.00	1.00	1.00	1.00
66	1.00	1.00	1.00	1.00	1.00	1.00	1.00
67	1.00	1.00	1.00	1.00	1.00	1.00	1.00
68	1.00	1.00	1.00	1.00	1.00	1.00	1.00
69	1.00	1.00	1.00	1.00	1.00	1.00	1.00
70	1.00	1.00	1.00	1.00	1.00	1.00	1.00
71	1.00	1.00	1.00	1.00	1.00	1.00	1.00
72+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
Garrison
Male

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4	1.00	1.00	1.00	1.00	1.00	1.00	1.00
5	1.00	1.00	1.00	1.00	1.00	1.00	1.00
6	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	1.00	1.00	1.00	1.00	1.00	1.00	1.00
8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11	1.00	1.00	1.00	1.00	1.00	1.00	1.00
12	1.00	1.00	1.00	1.00	1.00	1.00	1.00
13	1.00	1.00	1.00	1.00	1.00	1.00	1.00
14	1.00	1.00	1.00	1.00	1.00	1.00	1.00
15	1.00	1.00	1.00	1.00	1.00	1.00	1.00
16	1.00	1.00	1.00	1.00	1.00	1.00	1.00
17	1.00	1.00	1.00	1.00	1.00	1.00	1.00
18	1.00	1.00	1.00	1.00	1.00	1.00	1.00
19	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20	1.00	1.00	1.00	1.00	1.00	1.00	1.00
21	1.00	1.00	1.00	1.00	1.00	1.00	1.00
22	1.00	1.00	1.00	1.00	1.00	1.00	1.00
23	1.00	1.00	1.00	1.00	1.00	1.00	1.00
24	1.00	1.00	1.00	1.00	1.00	1.00	1.00
25	1.00	1.00	1.00	1.00	1.00	1.00	1.00
26	1.00	1.00	1.00	1.00	1.00	1.00	1.00
27	1.00	1.00	1.00	1.00	1.00	1.00	1.00
28	1.00	1.00	1.00	1.00	1.00	1.00	1.00
29	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30	1.00	1.00	1.00	1.00	1.00	1.00	1.00
31	1.00	1.00	1.00	1.00	1.00	1.00	1.00
32	1.00	1.00	1.00	1.00	1.00	1.00	1.00
33	1.00	1.00	1.00	1.00	1.00	1.00	1.00
34	1.00	1.00	1.00	1.00	1.00	1.00	1.00
35	1.00	1.00	1.00	1.00	1.00	1.00	1.00
36	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
Garrison
Male

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.00	1.00	1.00	1.00	1.00	1.00	1.00
38	1.00	1.00	1.00	1.00	1.00	1.00	1.00
39	1.00	1.00	1.00	1.00	1.00	1.00	1.00
40	1.00	1.00	1.00	1.00	1.00	1.00	1.00
41	1.00	1.00	1.00	1.00	1.00	1.00	1.00
42	1.00	1.00	1.00	1.00	1.00	1.00	1.00
43	1.00	1.00	1.00	1.00	1.00	1.00	1.00
44	1.00	1.00	1.00	1.00	1.00	1.00	1.00
45	1.00	1.00	1.00	1.00	1.00	1.00	1.00
46	1.00	1.00	1.00	1.00	1.00	1.00	1.00
47	1.00	1.00	1.00	1.00	1.00	1.00	1.00
48	1.00	1.00	1.00	1.00	1.00	1.00	1.00
49	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50	1.00	1.00	1.00	1.00	1.00	1.00	1.00
51	1.00	1.00	1.00	1.00	1.00	1.00	1.00
52	1.00	1.00	1.00	1.00	1.00	1.00	1.00
53	1.00	1.00	1.00	1.00	1.00	1.00	1.00
54	1.00	1.00	1.00	1.00	1.00	1.00	1.00
55	1.00	1.00	1.00	1.00	1.00	1.00	1.00
56	1.00	1.00	1.00	1.00	1.00	1.00	1.00
57	1.00	1.00	1.00	1.00	1.00	1.00	1.00
58	1.00	1.00	1.00	1.00	1.00	1.00	1.00
59	1.00	1.00	1.00	1.00	1.00	1.00	1.00
60	1.00	1.00	1.00	1.00	1.00	1.00	1.00
61	1.00	1.00	1.00	1.00	1.00	1.00	1.00
62	1.00	1.00	1.00	1.00	1.00	1.00	1.00
63	1.00	1.00	1.00	1.00	1.00	1.00	1.00
64	1.00	1.00	1.00	1.00	1.00	1.00	1.00
65	1.00	1.00	1.00	1.00	1.00	1.00	1.00
66	1.00	1.00	1.00	1.00	1.00	1.00	1.00
67	1.00	1.00	1.00	1.00	1.00	1.00	1.00
68	1.00	1.00	1.00	1.00	1.00	1.00	1.00
69	1.00	1.00	1.00	1.00	1.00	1.00	1.00
70	1.00	1.00	1.00	1.00	1.00	1.00	1.00
71	1.00	1.00	1.00	1.00	1.00	1.00	1.00
72+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA
Single

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4	1.00	1.00	1.00	1.00	1.00	1.00	1.00
5	1.00	1.00	1.00	1.00	1.00	1.00	1.00
6	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	1.00	1.00	1.00	1.00	1.00	1.00	1.00
8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11	1.00	1.00	1.00	1.00	1.00	1.00	1.00
12	1.00	1.00	1.00	1.00	1.00	1.00	1.00
13	1.00	1.00	1.00	1.00	1.00	1.00	1.00
14	1.00	1.00	1.00	1.00	1.00	1.00	1.00
15	1.00	1.00	1.00	1.00	1.00	1.00	1.00
16	1.00	1.00	1.00	1.00	1.00	1.00	1.00
17	1.00	1.00	1.00	1.00	1.00	1.00	1.00
18	1.00	1.00	1.00	1.00	1.00	1.00	1.00
19	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20	1.00	1.00	1.00	1.00	1.00	1.00	1.00
21	1.00	1.00	1.00	1.00	1.00	1.00	1.00
22	1.00	1.00	1.00	1.00	1.00	1.00	1.00
23	1.00	1.00	1.00	1.00	1.00	1.00	1.00
24	1.00	1.00	1.00	1.00	1.00	1.00	1.00
25	1.00	1.00	1.00	1.00	1.00	1.00	1.00
26	1.00	1.00	1.00	1.00	1.00	1.00	1.00
27	1.00	1.00	1.00	1.00	1.00	1.00	1.00
28	1.00	1.00	1.00	1.00	1.00	1.00	1.00
29	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30	1.00	1.00	1.00	1.00	1.00	1.00	1.00
31	1.00	1.00	1.00	1.00	1.00	1.00	1.00
32	1.00	1.00	1.00	1.00	1.00	1.00	1.00
33	1.00	1.00	1.00	1.00	1.00	1.00	1.00
34	1.00	1.00	1.00	1.00	1.00	1.00	1.00
35	1.00	1.00	1.00	1.00	1.00	1.00	1.00
36	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA
Single

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.00	1.00	1.00	1.00	1.00	1.00	1.00
38	1.00	1.00	1.00	1.00	1.00	1.00	1.00
39	1.00	1.00	1.00	1.00	1.00	1.00	1.00
40	1.00	1.00	1.00	1.00	1.00	1.00	1.00
41	1.00	1.00	1.00	1.00	1.00	1.00	1.00
42	1.00	1.00	1.00	1.00	1.00	1.00	1.00
43	1.00	1.00	1.00	1.00	1.00	1.00	1.00
44	1.00	1.00	1.00	1.00	1.00	1.00	1.00
45	1.00	1.00	1.00	1.00	1.00	1.00	1.00
46	1.00	1.00	1.00	1.00	1.00	1.00	1.00
47	1.00	1.00	1.00	1.00	1.00	1.00	1.00
48	1.00	1.00	1.00	1.00	1.00	1.00	1.00
49	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50	1.00	1.00	1.00	1.00	1.00	1.00	1.00
51	1.00	1.00	1.00	1.00	1.00	1.00	1.00
52	1.00	1.00	1.00	1.00	1.00	1.00	1.00
53	1.00	1.00	1.00	1.00	1.00	1.00	1.00
54	1.00	1.00	1.00	1.00	1.00	1.00	1.00
55	1.00	1.00	1.00	1.00	1.00	1.00	1.00
56	1.00	1.00	1.00	1.00	1.00	1.00	1.00
57	1.00	1.00	1.00	1.00	1.00	1.00	1.00
58	1.00	1.00	1.00	1.00	1.00	1.00	1.00
59	1.00	1.00	1.00	1.00	1.00	1.00	1.00
60	1.00	1.00	1.00	1.00	1.00	1.00	1.00
61	1.00	1.00	1.00	1.00	1.00	1.00	1.00
62	1.00	1.00	1.00	1.00	1.00	1.00	1.00
63	1.00	1.00	1.00	1.00	1.00	1.00	1.00
64	1.00	1.00	1.00	1.00	1.00	1.00	1.00
65	1.00	1.00	1.00	1.00	1.00	1.00	1.00
66	1.00	1.00	1.00	1.00	1.00	1.00	1.00
67	1.00	1.00	1.00	1.00	1.00	1.00	1.00
68	1.00	1.00	1.00	1.00	1.00	1.00	1.00
69	1.00	1.00	1.00	1.00	1.00	1.00	1.00
70	1.00	1.00	1.00	1.00	1.00	1.00	1.00
71	1.00	1.00	1.00	1.00	1.00	1.00	1.00
72+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC
Single

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4	1.00	1.00	1.00	1.00	1.00	1.00	1.00
5	1.00	1.00	1.00	1.00	1.00	1.00	1.00
6	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	1.00	1.00	1.00	1.00	1.00	1.00	1.00
8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11	1.00	1.00	1.00	1.00	1.00	1.00	1.00
12	1.00	1.00	1.00	1.00	1.00	1.00	1.00
13	1.00	1.00	1.00	1.00	1.00	1.00	1.00
14	1.00	1.00	1.00	1.00	1.00	1.00	1.00
15	1.00	1.00	1.00	1.00	1.00	1.00	1.00
16	1.00	1.00	1.00	1.00	1.00	1.00	1.00
17	1.00	1.00	1.00	1.00	1.00	1.00	1.00
18	1.00	1.00	1.00	1.00	1.00	1.00	1.00
19	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20	1.00	1.00	1.00	1.00	1.00	1.00	1.00
21	1.00	1.00	1.00	1.00	1.00	1.00	1.00
22	1.00	1.00	1.00	1.00	1.00	1.00	1.00
23	1.00	1.00	1.00	1.00	1.00	1.00	1.00
24	1.00	1.00	1.00	1.00	1.00	1.00	1.00
25	1.00	1.00	1.00	1.00	1.00	1.00	1.00
26	1.00	1.00	1.00	1.00	1.00	1.00	1.00
27	1.00	1.00	1.00	1.00	1.00	1.00	1.00
28	1.00	1.00	1.00	1.00	1.00	1.00	1.00
29	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30	1.00	1.00	1.00	1.00	1.00	1.00	1.00
31	1.00	1.00	1.00	1.00	1.00	1.00	1.00
32	1.00	1.00	1.00	1.00	1.00	1.00	1.00
33	1.00	1.00	1.00	1.00	1.00	1.00	1.00
34	1.00	1.00	1.00	1.00	1.00	1.00	1.00
35	1.00	1.00	1.00	1.00	1.00	1.00	1.00
36	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC
Single

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.00	1.00	1.00	1.00	1.00	1.00	1.00
38	1.00	1.00	1.00	1.00	1.00	1.00	1.00
39	1.00	1.00	1.00	1.00	1.00	1.00	1.00
40	1.00	1.00	1.00	1.00	1.00	1.00	1.00
41	1.00	1.00	1.00	1.00	1.00	1.00	1.00
42	1.00	1.00	1.00	1.00	1.00	1.00	1.00
43	1.00	1.00	1.00	1.00	1.00	1.00	1.00
44	1.00	1.00	1.00	1.00	1.00	1.00	1.00
45	1.00	1.00	1.00	1.00	1.00	1.00	1.00
46	1.00	1.00	1.00	1.00	1.00	1.00	1.00
47	1.00	1.00	1.00	1.00	1.00	1.00	1.00
48	1.00	1.00	1.00	1.00	1.00	1.00	1.00
49	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50	1.00	1.00	1.00	1.00	1.00	1.00	1.00
51	1.00	1.00	1.00	1.00	1.00	1.00	1.00
52	1.00	1.00	1.00	1.00	1.00	1.00	1.00
53	1.00	1.00	1.00	1.00	1.00	1.00	1.00
54	1.00	1.00	1.00	1.00	1.00	1.00	1.00
55	1.00	1.00	1.00	1.00	1.00	1.00	1.00
56	1.00	1.00	1.00	1.00	1.00	1.00	1.00
57	1.00	1.00	1.00	1.00	1.00	1.00	1.00
58	1.00	1.00	1.00	1.00	1.00	1.00	1.00
59	1.00	1.00	1.00	1.00	1.00	1.00	1.00
60	1.00	1.00	1.00	1.00	1.00	1.00	1.00
61	1.00	1.00	1.00	1.00	1.00	1.00	1.00
62	1.00	1.00	1.00	1.00	1.00	1.00	1.00
63	1.00	1.00	1.00	1.00	1.00	1.00	1.00
64	1.00	1.00	1.00	1.00	1.00	1.00	1.00
65	1.00	1.00	1.00	1.00	1.00	1.00	1.00
66	1.00	1.00	1.00	1.00	1.00	1.00	1.00
67	1.00	1.00	1.00	1.00	1.00	1.00	1.00
68	1.00	1.00	1.00	1.00	1.00	1.00	1.00
69	1.00	1.00	1.00	1.00	1.00	1.00	1.00
70	1.00	1.00	1.00	1.00	1.00	1.00	1.00
71	1.00	1.00	1.00	1.00	1.00	1.00	1.00
72+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
GIC
Single

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4	1.00	1.00	1.00	1.00	1.00	1.00	1.00
5	1.00	1.00	1.00	1.00	1.00	1.00	1.00
6	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	1.00	1.00	1.00	1.00	1.00	1.00	1.00
8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11	1.00	1.00	1.00	1.00	1.00	1.00	1.00
12	1.00	1.00	1.00	1.00	1.00	1.00	1.00
13	1.00	1.00	1.00	1.00	1.00	1.00	1.00
14	1.00	1.00	1.00	1.00	1.00	1.00	1.00
15	1.00	1.00	1.00	1.00	1.00	1.00	1.00
16	1.00	1.00	1.00	1.00	1.00	1.00	1.00
17	1.00	1.00	1.00	1.00	1.00	1.00	1.00
18	1.00	1.00	1.00	1.00	1.00	1.00	1.00
19	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20	1.00	1.00	1.00	1.00	1.00	1.00	1.00
21	1.00	1.00	1.00	1.00	1.00	1.00	1.00
22	1.00	1.00	1.00	1.00	1.00	1.00	1.00
23	1.00	1.00	1.00	1.00	1.00	1.00	1.00
24	1.00	1.00	1.00	1.00	1.00	1.00	1.00
25	1.00	1.00	1.00	1.00	1.00	1.00	1.00
26	1.00	1.00	1.00	1.00	1.00	1.00	1.00
27	1.00	1.00	1.00	1.00	1.00	1.00	1.00
28	1.00	1.00	1.00	1.00	1.00	1.00	1.00
29	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30	1.00	1.00	1.00	1.00	1.00	1.00	1.00
31	1.00	1.00	1.00	1.00	1.00	1.00	1.00
32	1.00	1.00	1.00	1.00	1.00	1.00	1.00
33	1.00	1.00	1.00	1.00	1.00	1.00	1.00
34	1.00	1.00	1.00	1.00	1.00	1.00	1.00
35	1.00	1.00	1.00	1.00	1.00	1.00	1.00
36	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
GIC
Single

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.00	1.00	1.00	1.00	1.00	1.00	1.00
38	1.00	1.00	1.00	1.00	1.00	1.00	1.00
39	1.00	1.00	1.00	1.00	1.00	1.00	1.00
40	1.00	1.00	1.00	1.00	1.00	1.00	1.00
41	1.00	1.00	1.00	1.00	1.00	1.00	1.00
42	1.00	1.00	1.00	1.00	1.00	1.00	1.00
43	1.00	1.00	1.00	1.00	1.00	1.00	1.00
44	1.00	1.00	1.00	1.00	1.00	1.00	1.00
45	1.00	1.00	1.00	1.00	1.00	1.00	1.00
46	1.00	1.00	1.00	1.00	1.00	1.00	1.00
47	1.00	1.00	1.00	1.00	1.00	1.00	1.00
48	1.00	1.00	1.00	1.00	1.00	1.00	1.00
49	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50	1.00	1.00	1.00	1.00	1.00	1.00	1.00
51	1.00	1.00	1.00	1.00	1.00	1.00	1.00
52	1.00	1.00	1.00	1.00	1.00	1.00	1.00
53	1.00	1.00	1.00	1.00	1.00	1.00	1.00
54	1.00	1.00	1.00	1.00	1.00	1.00	1.00
55	1.00	1.00	1.00	1.00	1.00	1.00	1.00
56	1.00	1.00	1.00	1.00	1.00	1.00	1.00
57	1.00	1.00	1.00	1.00	1.00	1.00	1.00
58	1.00	1.00	1.00	1.00	1.00	1.00	1.00
59	1.00	1.00	1.00	1.00	1.00	1.00	1.00
60	1.00	1.00	1.00	1.00	1.00	1.00	1.00
61	1.00	1.00	1.00	1.00	1.00	1.00	1.00
62	1.00	1.00	1.00	1.00	1.00	1.00	1.00
63	1.00	1.00	1.00	1.00	1.00	1.00	1.00
64	1.00	1.00	1.00	1.00	1.00	1.00	1.00
65	1.00	1.00	1.00	1.00	1.00	1.00	1.00
66	1.00	1.00	1.00	1.00	1.00	1.00	1.00
67	1.00	1.00	1.00	1.00	1.00	1.00	1.00
68	1.00	1.00	1.00	1.00	1.00	1.00	1.00
69	1.00	1.00	1.00	1.00	1.00	1.00	1.00
70	1.00	1.00	1.00	1.00	1.00	1.00	1.00
71	1.00	1.00	1.00	1.00	1.00	1.00	1.00
72+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
Garrison
Single

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4	1.00	1.00	1.00	1.00	1.00	1.00	1.00
5	1.00	1.00	1.00	1.00	1.00	1.00	1.00
6	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	1.00	1.00	1.00	1.00	1.00	1.00	1.00
8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11	1.00	1.00	1.00	1.00	1.00	1.00	1.00
12	1.00	1.00	1.00	1.00	1.00	1.00	1.00
13	1.00	1.00	1.00	1.00	1.00	1.00	1.00
14	1.00	1.00	1.00	1.00	1.00	1.00	1.00
15	1.00	1.00	1.00	1.00	1.00	1.00	1.00
16	1.00	1.00	1.00	1.00	1.00	1.00	1.00
17	1.00	1.00	1.00	1.00	1.00	1.00	1.00
18	1.00	1.00	1.00	1.00	1.00	1.00	1.00
19	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20	1.00	1.00	1.00	1.00	1.00	1.00	1.00
21	1.00	1.00	1.00	1.00	1.00	1.00	1.00
22	1.00	1.00	1.00	1.00	1.00	1.00	1.00
23	1.00	1.00	1.00	1.00	1.00	1.00	1.00
24	1.00	1.00	1.00	1.00	1.00	1.00	1.00
25	1.00	1.00	1.00	1.00	1.00	1.00	1.00
26	1.00	1.00	1.00	1.00	1.00	1.00	1.00
27	1.00	1.00	1.00	1.00	1.00	1.00	1.00
28	1.00	1.00	1.00	1.00	1.00	1.00	1.00
29	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30	1.00	1.00	1.00	1.00	1.00	1.00	1.00
31	1.00	1.00	1.00	1.00	1.00	1.00	1.00
32	1.00	1.00	1.00	1.00	1.00	1.00	1.00
33	1.00	1.00	1.00	1.00	1.00	1.00	1.00
34	1.00	1.00	1.00	1.00	1.00	1.00	1.00
35	1.00	1.00	1.00	1.00	1.00	1.00	1.00
36	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
Garrison
Single

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	1.00	1.00	1.00	1.00	1.00	1.00	1.00
38	1.00	1.00	1.00	1.00	1.00	1.00	1.00
39	1.00	1.00	1.00	1.00	1.00	1.00	1.00
40	1.00	1.00	1.00	1.00	1.00	1.00	1.00
41	1.00	1.00	1.00	1.00	1.00	1.00	1.00
42	1.00	1.00	1.00	1.00	1.00	1.00	1.00
43	1.00	1.00	1.00	1.00	1.00	1.00	1.00
44	1.00	1.00	1.00	1.00	1.00	1.00	1.00
45	1.00	1.00	1.00	1.00	1.00	1.00	1.00
46	1.00	1.00	1.00	1.00	1.00	1.00	1.00
47	1.00	1.00	1.00	1.00	1.00	1.00	1.00
48	1.00	1.00	1.00	1.00	1.00	1.00	1.00
49	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50	1.00	1.00	1.00	1.00	1.00	1.00	1.00
51	1.00	1.00	1.00	1.00	1.00	1.00	1.00
52	1.00	1.00	1.00	1.00	1.00	1.00	1.00
53	1.00	1.00	1.00	1.00	1.00	1.00	1.00
54	1.00	1.00	1.00	1.00	1.00	1.00	1.00
55	1.00	1.00	1.00	1.00	1.00	1.00	1.00
56	1.00	1.00	1.00	1.00	1.00	1.00	1.00
57	1.00	1.00	1.00	1.00	1.00	1.00	1.00
58	1.00	1.00	1.00	1.00	1.00	1.00	1.00
59	1.00	1.00	1.00	1.00	1.00	1.00	1.00
60	1.00	1.00	1.00	1.00	1.00	1.00	1.00
61	1.00	1.00	1.00	1.00	1.00	1.00	1.00
62	1.00	1.00	1.00	1.00	1.00	1.00	1.00
63	1.00	1.00	1.00	1.00	1.00	1.00	1.00
64	1.00	1.00	1.00	1.00	1.00	1.00	1.00
65	1.00	1.00	1.00	1.00	1.00	1.00	1.00
66	1.00	1.00	1.00	1.00	1.00	1.00	1.00
67	1.00	1.00	1.00	1.00	1.00	1.00	1.00
68	1.00	1.00	1.00	1.00	1.00	1.00	1.00
69	1.00	1.00	1.00	1.00	1.00	1.00	1.00
70	1.00	1.00	1.00	1.00	1.00	1.00	1.00
71	1.00	1.00	1.00	1.00	1.00	1.00	1.00
72+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA
Married

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.65	0.59	0.90	0.80	0.80	0.77	0.80
1	0.65	0.67	0.89	0.80	0.80	0.77	0.80
2	0.65	0.71	0.88	0.81	0.81	0.77	0.81
3	0.68	0.74	0.87	0.81	0.81	0.77	0.81
4	0.70	0.77	0.86	0.82	0.82	0.77	0.82
5	0.72	0.80	0.85	0.82	0.82	0.77	0.82
6	0.74	0.80	0.85	0.82	0.83	0.77	0.82
7	0.76	0.81	0.84	0.83	0.84	0.77	0.83
8	0.78	0.81	0.83	0.83	0.85	0.77	0.83
9	0.80	0.82	0.82	0.84	0.86	0.78	0.84
10	0.82	0.82	0.81	0.84	0.86	0.78	0.84
11	0.84	0.83	0.81	0.84	0.87	0.78	0.84
12	0.85	0.83	0.80	0.85	0.87	0.79	0.85
13	0.86	0.84	0.79	0.85	0.88	0.79	0.85
14	0.87	0.84	0.79	0.86	0.89	0.79	0.86
15	0.88	0.85	0.79	0.86	0.90	0.80	0.86
16	0.89	0.85	0.79	0.86	0.90	0.80	0.86
17	0.90	0.86	0.79	0.87	0.90	0.80	0.87
18	0.90	0.86	0.79	0.87	0.90	0.81	0.87
19	0.90	0.87	0.79	0.88	0.90	0.81	0.88
20	0.90	0.87	0.79	0.88	0.90	0.81	0.88
21	0.90	0.88	0.79	0.88	0.90	0.82	0.88
22	0.90	0.88	0.79	0.89	0.90	0.82	0.89
23	0.90	0.89	0.79	0.89	0.90	0.82	0.89
24	0.90	0.89	0.79	0.90	0.90	0.83	0.90
25	0.90	0.90	0.79	0.90	0.91	0.83	0.90
26	0.90	0.90	0.79	0.90	0.91	0.83	0.90
27	0.90	0.90	0.79	0.90	0.91	0.84	0.90
28	0.90	0.90	0.79	0.90	0.91	0.84	0.90
29	0.90	0.90	0.79	0.90	0.92	0.84	0.90
30	0.90	0.90	0.79	0.90	0.92	0.85	0.90
31	0.90	0.90	0.79	0.90	0.92	0.85	0.90
32	0.90	0.90	0.79	0.90	0.92	0.85	0.90
33	0.90	0.90	0.79	0.90	0.93	0.86	0.90
34	0.90	0.90	0.79	0.90	0.93	0.86	0.90
35	0.90	0.90	0.79	0.90	0.93	0.86	0.90
36	0.90	0.90	0.80	0.90	0.93	0.87	0.90

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
USAA
Married

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	0.90	0.90	0.81	0.90	0.94	0.87	0.90
38	0.90	0.90	0.81	0.90	0.94	0.87	0.90
39	0.89	0.90	0.81	0.90	0.95	0.88	0.90
40	0.89	0.90	0.81	0.90	0.95	0.88	0.90
41	0.88	0.90	0.81	0.90	0.96	0.88	0.90
42	0.88	0.90	0.81	0.90	0.96	0.89	0.90
43	0.87	0.90	0.81	0.90	0.97	0.89	0.90
44	0.87	0.90	0.81	0.90	0.97	0.89	0.90
45	0.86	0.90	0.81	0.90	0.98	0.89	0.90
46	0.86	0.90	0.81	0.90	0.98	0.89	0.90
47	0.85	0.90	0.81	0.91	0.99	0.89	0.91
48	0.85	0.90	0.81	0.92	0.99	0.89	0.92
49	0.85	0.90	0.82	0.93	1.00	0.89	0.93
50	0.85	0.90	0.83	0.94	1.00	0.89	0.94
51	0.85	0.90	0.83	0.95	1.01	0.89	0.95
52	0.85	0.90	0.83	0.96	1.02	0.89	0.96
53	0.85	0.90	0.83	0.97	1.03	0.89	0.97
54	0.85	0.90	0.84	0.97	1.04	0.89	0.97
55	0.85	0.90	0.84	0.98	1.05	0.89	0.98
56	0.85	0.90	0.85	0.99	1.06	0.89	0.99
57	0.85	0.89	0.85	1.00	1.07	0.89	1.00
58	0.85	0.87	0.86	1.00	1.08	0.89	1.00
59	0.85	0.85	0.86	1.00	1.09	0.89	1.00
60	0.85	0.85	0.87	1.00	1.10	0.89	1.00
61	0.85	0.85	0.88	1.00	1.11	0.89	1.00
62	0.85	0.85	0.88	1.00	1.12	0.89	1.00
63	0.85	0.85	0.89	1.00	1.13	0.89	1.00
64	0.85	0.85	0.90	1.00	1.14	0.89	1.00
65	0.85	0.85	0.91	1.00	1.14	0.89	1.00
66	0.85	0.85	0.92	1.00	1.14	0.89	1.00
67	0.85	0.85	0.92	1.00	1.14	0.89	1.00
68	0.85	0.85	0.92	1.00	1.14	0.89	1.00
69	0.85	0.85	0.93	1.00	1.14	0.89	1.00
70	0.85	0.85	0.93	1.00	1.14	0.89	1.00
71	0.85	0.85	0.94	1.00	1.14	0.89	1.00
72+	0.85	0.85	0.95	1.00	1.14	0.89	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC
Married

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.65	0.59	0.90	0.80	0.80	0.77	0.80
1	0.65	0.67	0.89	0.80	0.80	0.77	0.80
2	0.65	0.71	0.88	0.81	0.81	0.77	0.81
3	0.68	0.74	0.87	0.81	0.81	0.77	0.81
4	0.70	0.77	0.86	0.82	0.82	0.77	0.82
5	0.72	0.80	0.85	0.82	0.82	0.77	0.82
6	0.74	0.80	0.85	0.82	0.83	0.77	0.82
7	0.76	0.81	0.84	0.83	0.84	0.77	0.83
8	0.78	0.81	0.83	0.83	0.85	0.77	0.83
9	0.80	0.82	0.82	0.84	0.86	0.78	0.84
10	0.82	0.82	0.81	0.84	0.86	0.78	0.84
11	0.84	0.83	0.81	0.84	0.87	0.78	0.84
12	0.85	0.83	0.80	0.85	0.87	0.79	0.85
13	0.86	0.84	0.79	0.85	0.88	0.79	0.85
14	0.87	0.84	0.79	0.86	0.89	0.79	0.86
15	0.88	0.85	0.79	0.86	0.90	0.80	0.86
16	0.89	0.85	0.79	0.86	0.90	0.80	0.86
17	0.90	0.86	0.79	0.87	0.90	0.80	0.87
18	0.90	0.86	0.79	0.87	0.90	0.81	0.87
19	0.90	0.87	0.79	0.88	0.90	0.81	0.88
20	0.90	0.87	0.79	0.88	0.90	0.81	0.88
21	0.90	0.88	0.79	0.88	0.90	0.82	0.88
22	0.90	0.88	0.79	0.89	0.90	0.82	0.89
23	0.90	0.89	0.79	0.89	0.90	0.82	0.89
24	0.90	0.89	0.79	0.90	0.90	0.83	0.90
25	0.90	0.90	0.79	0.90	0.91	0.83	0.90
26	0.90	0.90	0.79	0.90	0.91	0.83	0.90
27	0.90	0.90	0.79	0.90	0.91	0.84	0.90
28	0.90	0.90	0.79	0.90	0.91	0.84	0.90
29	0.90	0.90	0.79	0.90	0.92	0.84	0.90
30	0.90	0.90	0.79	0.90	0.92	0.85	0.90
31	0.90	0.90	0.79	0.90	0.92	0.85	0.90
32	0.90	0.90	0.79	0.90	0.92	0.85	0.90
33	0.90	0.90	0.79	0.90	0.93	0.86	0.90
34	0.90	0.90	0.79	0.90	0.93	0.86	0.90
35	0.90	0.90	0.79	0.90	0.93	0.86	0.90
36	0.90	0.90	0.80	0.90	0.93	0.87	0.90

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
CIC
Married

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	0.90	0.90	0.81	0.90	0.94	0.87	0.90
38	0.90	0.90	0.81	0.90	0.94	0.87	0.90
39	0.89	0.90	0.81	0.90	0.95	0.88	0.90
40	0.89	0.90	0.81	0.90	0.95	0.88	0.90
41	0.88	0.90	0.81	0.90	0.96	0.88	0.90
42	0.88	0.90	0.81	0.90	0.96	0.89	0.90
43	0.87	0.90	0.81	0.90	0.97	0.89	0.90
44	0.87	0.90	0.81	0.90	0.97	0.89	0.90
45	0.86	0.90	0.81	0.90	0.98	0.89	0.90
46	0.86	0.90	0.81	0.90	0.98	0.89	0.90
47	0.85	0.90	0.81	0.91	0.99	0.89	0.91
48	0.85	0.90	0.81	0.92	0.99	0.89	0.92
49	0.85	0.90	0.82	0.93	1.00	0.89	0.93
50	0.85	0.90	0.83	0.94	1.00	0.89	0.94
51	0.85	0.90	0.83	0.95	1.01	0.89	0.95
52	0.85	0.90	0.83	0.96	1.02	0.89	0.96
53	0.85	0.90	0.83	0.97	1.03	0.89	0.97
54	0.85	0.90	0.84	0.97	1.04	0.89	0.97
55	0.85	0.90	0.84	0.98	1.05	0.89	0.98
56	0.85	0.90	0.85	0.99	1.06	0.89	0.99
57	0.85	0.89	0.85	1.00	1.07	0.89	1.00
58	0.85	0.87	0.86	1.00	1.08	0.89	1.00
59	0.85	0.85	0.86	1.00	1.09	0.89	1.00
60	0.85	0.85	0.87	1.00	1.10	0.89	1.00
61	0.85	0.85	0.88	1.00	1.11	0.89	1.00
62	0.85	0.85	0.88	1.00	1.12	0.89	1.00
63	0.85	0.85	0.89	1.00	1.13	0.89	1.00
64	0.85	0.85	0.90	1.00	1.14	0.89	1.00
65	0.85	0.85	0.91	1.00	1.14	0.89	1.00
66	0.85	0.85	0.92	1.00	1.14	0.89	1.00
67	0.85	0.85	0.92	1.00	1.14	0.89	1.00
68	0.85	0.85	0.92	1.00	1.14	0.89	1.00
69	0.85	0.85	0.93	1.00	1.14	0.89	1.00
70	0.85	0.85	0.93	1.00	1.14	0.89	1.00
71	0.85	0.85	0.94	1.00	1.14	0.89	1.00
72+	0.85	0.85	0.95	1.00	1.14	0.89	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience
GIC
Married

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.65	0.59	0.90	0.80	0.80	0.77	0.80
1	0.65	0.67	0.89	0.80	0.80	0.77	0.80
2	0.65	0.71	0.88	0.81	0.81	0.77	0.81
3	0.68	0.74	0.87	0.81	0.81	0.77	0.81
4	0.70	0.77	0.86	0.82	0.82	0.77	0.82
5	0.72	0.80	0.85	0.82	0.82	0.77	0.82
6	0.74	0.80	0.85	0.82	0.83	0.77	0.82
7	0.76	0.81	0.84	0.83	0.84	0.77	0.83
8	0.78	0.81	0.83	0.83	0.85	0.77	0.83
9	0.80	0.82	0.82	0.84	0.86	0.78	0.84
10	0.82	0.82	0.81	0.84	0.86	0.78	0.84
11	0.84	0.83	0.81	0.84	0.87	0.78	0.84
12	0.85	0.83	0.80	0.85	0.87	0.79	0.85
13	0.86	0.84	0.79	0.85	0.88	0.79	0.85
14	0.87	0.84	0.79	0.86	0.89	0.79	0.86
15	0.88	0.85	0.79	0.86	0.90	0.80	0.86
16	0.89	0.85	0.79	0.86	0.90	0.80	0.86
17	0.90	0.86	0.79	0.87	0.90	0.80	0.87
18	0.90	0.86	0.79	0.87	0.90	0.81	0.87
19	0.90	0.87	0.79	0.88	0.90	0.81	0.88
20	0.90	0.87	0.79	0.88	0.90	0.81	0.88
21	0.90	0.88	0.79	0.88	0.90	0.82	0.88
22	0.90	0.88	0.79	0.89	0.90	0.82	0.89
23	0.90	0.89	0.79	0.89	0.90	0.82	0.89
24	0.90	0.89	0.79	0.90	0.90	0.83	0.90
25	0.90	0.90	0.79	0.90	0.91	0.83	0.90
26	0.90	0.90	0.79	0.90	0.91	0.83	0.90
27	0.90	0.90	0.79	0.90	0.91	0.84	0.90
28	0.90	0.90	0.79	0.90	0.91	0.84	0.90
29	0.90	0.90	0.79	0.90	0.92	0.84	0.90
30	0.90	0.90	0.79	0.90	0.92	0.85	0.90
31	0.90	0.90	0.79	0.90	0.92	0.85	0.90
32	0.90	0.90	0.79	0.90	0.92	0.85	0.90
33	0.90	0.90	0.79	0.90	0.93	0.86	0.90
34	0.90	0.90	0.79	0.90	0.93	0.86	0.90
35	0.90	0.90	0.79	0.90	0.93	0.86	0.90
36	0.90	0.90	0.80	0.90	0.93	0.87	0.90

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Years Driving Experience

GIC

Married

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	0.90	0.90	0.81	0.90	0.94	0.87	0.90
38	0.90	0.90	0.81	0.90	0.94	0.87	0.90
39	0.89	0.90	0.81	0.90	0.95	0.88	0.90
40	0.89	0.90	0.81	0.90	0.95	0.88	0.90
41	0.88	0.90	0.81	0.90	0.96	0.88	0.90
42	0.88	0.90	0.81	0.90	0.96	0.89	0.90
43	0.87	0.90	0.81	0.90	0.97	0.89	0.90
44	0.87	0.90	0.81	0.90	0.97	0.89	0.90
45	0.86	0.90	0.81	0.90	0.98	0.89	0.90
46	0.86	0.90	0.81	0.90	0.98	0.89	0.90
47	0.85	0.90	0.81	0.91	0.99	0.89	0.91
48	0.85	0.90	0.81	0.92	0.99	0.89	0.92
49	0.85	0.90	0.82	0.93	1.00	0.89	0.93
50	0.85	0.90	0.83	0.94	1.00	0.89	0.94
51	0.85	0.90	0.83	0.95	1.01	0.89	0.95
52	0.85	0.90	0.83	0.96	1.02	0.89	0.96
53	0.85	0.90	0.83	0.97	1.03	0.89	0.97
54	0.85	0.90	0.84	0.97	1.04	0.89	0.97
55	0.85	0.90	0.84	0.98	1.05	0.89	0.98
56	0.85	0.90	0.85	0.99	1.06	0.89	0.99
57	0.85	0.89	0.85	1.00	1.07	0.89	1.00
58	0.85	0.87	0.86	1.00	1.08	0.89	1.00
59	0.85	0.85	0.86	1.00	1.09	0.89	1.00
60	0.85	0.85	0.87	1.00	1.10	0.89	1.00
61	0.85	0.85	0.88	1.00	1.11	0.89	1.00
62	0.85	0.85	0.88	1.00	1.12	0.89	1.00
63	0.85	0.85	0.89	1.00	1.13	0.89	1.00
64	0.85	0.85	0.90	1.00	1.14	0.89	1.00
65	0.85	0.85	0.91	1.00	1.14	0.89	1.00
66	0.85	0.85	0.92	1.00	1.14	0.89	1.00
67	0.85	0.85	0.92	1.00	1.14	0.89	1.00
68	0.85	0.85	0.92	1.00	1.14	0.89	1.00
69	0.85	0.85	0.93	1.00	1.14	0.89	1.00
70	0.85	0.85	0.93	1.00	1.14	0.89	1.00
71	0.85	0.85	0.94	1.00	1.14	0.89	1.00
72+	0.85	0.85	0.95	1.00	1.14	0.89	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE CO

Years Driving Experience
Garrison
Married

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	0.65	0.59	0.90	0.80	0.80	0.77	0.80
1	0.65	0.67	0.89	0.80	0.80	0.77	0.80
2	0.65	0.71	0.88	0.81	0.81	0.77	0.81
3	0.68	0.74	0.87	0.81	0.81	0.77	0.81
4	0.70	0.77	0.86	0.82	0.82	0.77	0.82
5	0.72	0.80	0.85	0.82	0.82	0.77	0.82
6	0.74	0.80	0.85	0.82	0.83	0.77	0.82
7	0.76	0.81	0.84	0.83	0.84	0.77	0.83
8	0.78	0.81	0.83	0.83	0.85	0.77	0.83
9	0.80	0.82	0.82	0.84	0.86	0.78	0.84
10	0.82	0.82	0.81	0.84	0.86	0.78	0.84
11	0.84	0.83	0.81	0.84	0.87	0.78	0.84
12	0.85	0.83	0.80	0.85	0.87	0.79	0.85
13	0.86	0.84	0.79	0.85	0.88	0.79	0.85
14	0.87	0.84	0.79	0.86	0.89	0.79	0.86
15	0.88	0.85	0.79	0.86	0.90	0.80	0.86
16	0.89	0.85	0.79	0.86	0.90	0.80	0.86
17	0.90	0.86	0.79	0.87	0.90	0.80	0.87
18	0.90	0.86	0.79	0.87	0.90	0.81	0.87
19	0.90	0.87	0.79	0.88	0.90	0.81	0.88
20	0.90	0.87	0.79	0.88	0.90	0.81	0.88
21	0.90	0.88	0.79	0.88	0.90	0.82	0.88
22	0.90	0.88	0.79	0.89	0.90	0.82	0.89
23	0.90	0.89	0.79	0.89	0.90	0.82	0.89
24	0.90	0.89	0.79	0.90	0.90	0.83	0.90
25	0.90	0.90	0.79	0.90	0.91	0.83	0.90
26	0.90	0.90	0.79	0.90	0.91	0.83	0.90
27	0.90	0.90	0.79	0.90	0.91	0.84	0.90
28	0.90	0.90	0.79	0.90	0.91	0.84	0.90
29	0.90	0.90	0.79	0.90	0.92	0.84	0.90
30	0.90	0.90	0.79	0.90	0.92	0.85	0.90
31	0.90	0.90	0.79	0.90	0.92	0.85	0.90
32	0.90	0.90	0.79	0.90	0.92	0.85	0.90
33	0.90	0.90	0.79	0.90	0.93	0.86	0.90
34	0.90	0.90	0.79	0.90	0.93	0.86	0.90
35	0.90	0.90	0.79	0.90	0.93	0.86	0.90
36	0.90	0.90	0.80	0.90	0.93	0.87	0.90

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE CO

Years Driving Experience

Garrison

Married

<u>Years Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
37	0.90	0.90	0.81	0.90	0.94	0.87	0.90
38	0.90	0.90	0.81	0.90	0.94	0.87	0.90
39	0.89	0.90	0.81	0.90	0.95	0.88	0.90
40	0.89	0.90	0.81	0.90	0.95	0.88	0.90
41	0.88	0.90	0.81	0.90	0.96	0.88	0.90
42	0.88	0.90	0.81	0.90	0.96	0.89	0.90
43	0.87	0.90	0.81	0.90	0.97	0.89	0.90
44	0.87	0.90	0.81	0.90	0.97	0.89	0.90
45	0.86	0.90	0.81	0.90	0.98	0.89	0.90
46	0.86	0.90	0.81	0.90	0.98	0.89	0.90
47	0.85	0.90	0.81	0.91	0.99	0.89	0.91
48	0.85	0.90	0.81	0.92	0.99	0.89	0.92
49	0.85	0.90	0.82	0.93	1.00	0.89	0.93
50	0.85	0.90	0.83	0.94	1.00	0.89	0.94
51	0.85	0.90	0.83	0.95	1.01	0.89	0.95
52	0.85	0.90	0.83	0.96	1.02	0.89	0.96
53	0.85	0.90	0.83	0.97	1.03	0.89	0.97
54	0.85	0.90	0.84	0.97	1.04	0.89	0.97
55	0.85	0.90	0.84	0.98	1.05	0.89	0.98
56	0.85	0.90	0.85	0.99	1.06	0.89	0.99
57	0.85	0.89	0.85	1.00	1.07	0.89	1.00
58	0.85	0.87	0.86	1.00	1.08	0.89	1.00
59	0.85	0.85	0.86	1.00	1.09	0.89	1.00
60	0.85	0.85	0.87	1.00	1.10	0.89	1.00
61	0.85	0.85	0.88	1.00	1.11	0.89	1.00
62	0.85	0.85	0.88	1.00	1.12	0.89	1.00
63	0.85	0.85	0.89	1.00	1.13	0.89	1.00
64	0.85	0.85	0.90	1.00	1.14	0.89	1.00
65	0.85	0.85	0.91	1.00	1.14	0.89	1.00
66	0.85	0.85	0.92	1.00	1.14	0.89	1.00
67	0.85	0.85	0.92	1.00	1.14	0.89	1.00
68	0.85	0.85	0.92	1.00	1.14	0.89	1.00
69	0.85	0.85	0.93	1.00	1.14	0.89	1.00
70	0.85	0.85	0.93	1.00	1.14	0.89	1.00
71	0.85	0.85	0.94	1.00	1.14	0.89	1.00
72+	0.85	0.85	0.95	1.00	1.14	0.89	1.00
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

MISCELLANEOUS FACTORS
USAA

Car Replacement Assistance

<u>CP</u>	<u>CL</u>
1.061	1.097

Ride Share Gap Protection Coverage

<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>EB</u>	<u>CP</u>	<u>CL</u>	<u>RR</u>	<u>T&L</u>	<u>WOCD</u>
1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07

Vehicle Usage

<u>Usage</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
Business	1.10	1.10	1.10	1.10	1.00	1.10	1.10
Farm	0.80	0.80	0.80	0.80	1.00	0.80	0.80
Other	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Vehicle Injury Rating

<u>Category</u>	<u>MP</u>	<u>EB</u>
Low	0.94	0.94
Medium	1.00	1.00
High	1.20	1.20
Ineligible	1.00	1.00

Driver Training

<u>Category</u>	<u>Years of Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
With Training	0 to 2	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Not Applicable	3+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle		1.00	1.00	1.00	1.00	1.00	1.00	1.00

State: **CALIFORNIA**
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USAA CASUALTY INSURANCE COMPANY
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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

MISCELLANEOUS FACTORS

USAA

Operator Status

<u>Category</u>	<u>Years of Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
Occasional Operator	0 to 2	0.85	0.85	0.85	0.85	0.85	0.85	0.85
Occasional Operator	3 to 4	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Occasional Operator	5 to 8	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Principal Operator	0 to 8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Not Applicable	9+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle		1.00	1.00	1.00	1.00	1.00	1.00	1.00

Multiple Car

<u>Category</u>		<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
1 Oper	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1 Oper	2 Vehs	0.90	0.90	0.90	0.90	0.90	0.90	0.90
1 Oper	3 Vehs	0.89	0.89	0.89	0.89	0.89	0.89	0.89
1 Oper	4+ Vehs	0.85	0.85	0.85	0.85	0.85	0.85	0.85
2 Opers	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2 Opers	2 Vehs	0.88	0.88	0.88	0.88	0.88	0.88	0.88
2 Opers	3 Vehs	0.86	0.86	0.86	0.86	0.86	0.86	0.86
2 Opers	4+ Vehs	0.84	0.84	0.84	0.84	0.84	0.84	0.84
3 Opers	1 Veh	1.05	1.05	1.05	1.05	1.05	1.05	1.05
3 Opers	2 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
3 Opers	3 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
3 Opers	4+ Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4+ Opers	2 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	3 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	4+ Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95

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USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

MISCELLANEOUS FACTORS
CIC

Car Replacement Assistance

<u>CP</u>	<u>CL</u>
1.061	1.097

Ride Share Gap Protection Coverage

<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>EB</u>	<u>CP</u>	<u>CL</u>	<u>RR</u>	<u>T&L</u>	<u>WOCD</u>
1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07

Vehicle Usage

<u>Usage</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
Business	1.10	1.10	1.10	1.10	1.00	1.10	1.10
Farm	0.80	0.80	0.80	0.80	1.00	0.80	0.80
Other	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Vehicle Injury Rating

<u>Category</u>	<u>MP</u>	<u>EB</u>
Low	0.94	0.94
Medium	1.00	1.00
High	1.20	1.20
Ineligible	1.00	1.00

Driver Training

<u>Category</u>	<u>Years of Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
With Training	0 to 2	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Not Applicable	3+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle		1.00	1.00	1.00	1.00	1.00	1.00	1.00

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MISCELLANEOUS FACTORS

CIC

Operator Status

<u>Category</u>	<u>Years of Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
Occasional Operator	0 to 2	0.85	0.85	0.85	0.85	0.85	0.85	0.85
Occasional Operator	3 to 4	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Occasional Operator	5 to 8	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Principal Operator	0 to 8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Not Applicable	9+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle		1.00	1.00	1.00	1.00	1.00	1.00	1.00

Multiple Car

<u>Category</u>		<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
1 Oper	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1 Oper	2 Vehs	0.90	0.90	0.90	0.90	0.90	0.90	0.90
1 Oper	3 Vehs	0.89	0.89	0.89	0.89	0.89	0.89	0.89
1 Oper	4+ Vehs	0.85	0.85	0.85	0.85	0.85	0.85	0.85
2 Opers	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2 Opers	2 Vehs	0.88	0.88	0.88	0.88	0.88	0.88	0.88
2 Opers	3 Vehs	0.86	0.86	0.86	0.86	0.86	0.86	0.86
2 Opers	4+ Vehs	0.84	0.84	0.84	0.84	0.84	0.84	0.84
3 Opers	1 Veh	1.05	1.05	1.05	1.05	1.05	1.05	1.05
3 Opers	2 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
3 Opers	3 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
3 Opers	4+ Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4+ Opers	2 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	3 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	4+ Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95

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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

MISCELLANEOUS FACTORS
GIC

Car Replacement Assistance

<u>CP</u>	<u>CL</u>
1.061	1.097

Ride Share Gap Protection Coverage

<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>EB</u>	<u>CP</u>	<u>CL</u>	<u>RR</u>	<u>T&L</u>	<u>WOCD</u>
1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07

Vehicle Usage

<u>Usage</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
Business	1.10	1.10	1.10	1.10	1.00	1.10	1.10
Farm	0.80	0.80	0.80	0.80	1.00	0.80	0.80
Other	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Vehicle Injury Rating

<u>Category</u>	<u>MP</u>	<u>EB</u>
Low	0.94	0.94
Medium	1.00	1.00
High	1.20	1.20
Ineligible	1.00	1.00

Driver Training

<u>Category</u>	<u>Years of Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
With Training	0 to 2	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Not Applicable	3+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle		1.00	1.00	1.00	1.00	1.00	1.00	1.00

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GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

MISCELLANEOUS FACTORS

GIC

Operator Status

<u>Category</u>	<u>Years of Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
Occasional Operator	0 to 2	0.85	0.85	0.85	0.85	0.85	0.85	0.85
Occasional Operator	3 to 4	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Occasional Operator	5 to 8	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Principal Operator	0 to 8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Not Applicable	9+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle		1.00	1.00	1.00	1.00	1.00	1.00	1.00

Multiple Car

<u>Category</u>		<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
1 Oper	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1 Oper	2 Vehs	0.90	0.90	0.90	0.90	0.90	0.90	0.90
1 Oper	3 Vehs	0.89	0.89	0.89	0.89	0.89	0.89	0.89
1 Oper	4+ Vehs	0.85	0.85	0.85	0.85	0.85	0.85	0.85
2 Opers	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2 Opers	2 Vehs	0.88	0.88	0.88	0.88	0.88	0.88	0.88
2 Opers	3 Vehs	0.86	0.86	0.86	0.86	0.86	0.86	0.86
2 Opers	4+ Vehs	0.84	0.84	0.84	0.84	0.84	0.84	0.84
3 Opers	1 Veh	1.05	1.05	1.05	1.05	1.05	1.05	1.05
3 Opers	2 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
3 Opers	3 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
3 Opers	4+ Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4+ Opers	2 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	3 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	4+ Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95

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MISCELLANEOUS FACTORS

Garrison

Car Replacement Assistance

<u>CP</u>	<u>CL</u>
1.061	1.097

Ride Share Gap Protection Coverage

<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>EB</u>	<u>CP</u>	<u>CL</u>	<u>RR</u>	<u>T&L</u>	<u>WOCD</u>
1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07	1.07

Vehicle Usage

<u>Usage</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
Business	1.10	1.10	1.10	1.10	1.00	1.10	1.10
Farm	0.80	0.80	0.80	0.80	1.00	0.80	0.80
Other	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Vehicle Injury Rating

<u>Category</u>	<u>MP</u>	<u>EB</u>
Low	0.94	0.94
Medium	1.00	1.00
High	1.20	1.20
Ineligible	1.00	1.00

Driver Training

<u>Category</u>	<u>Years of Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
With Training	0 to 2	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Not Applicable	3+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle		1.00	1.00	1.00	1.00	1.00	1.00	1.00

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USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

MISCELLANEOUS FACTORS

Garrison

Operator Status

<u>Category</u>	<u>Years of Driving Experience</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
Occasional Operator	0 to 2	0.85	0.85	0.85	0.85	0.85	0.85	0.85
Occasional Operator	3 to 4	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Occasional Operator	5 to 8	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Principal Operator	0 to 8	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Not Applicable	9+	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Excess Vehicle		1.00	1.00	1.00	1.00	1.00	1.00	1.00

Multiple Car

<u>Category</u>		<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
1 Oper	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1 Oper	2 Vehs	0.90	0.90	0.90	0.90	0.90	0.90	0.90
1 Oper	3 Vehs	0.89	0.89	0.89	0.89	0.89	0.89	0.89
1 Oper	4+ Vehs	0.85	0.85	0.85	0.85	0.85	0.85	0.85
2 Opers	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2 Opers	2 Vehs	0.88	0.88	0.88	0.88	0.88	0.88	0.88
2 Opers	3 Vehs	0.86	0.86	0.86	0.86	0.86	0.86	0.86
2 Opers	4+ Vehs	0.84	0.84	0.84	0.84	0.84	0.84	0.84
3 Opers	1 Veh	1.05	1.05	1.05	1.05	1.05	1.05	1.05
3 Opers	2 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
3 Opers	3 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
3 Opers	4+ Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	1 Veh	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4+ Opers	2 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	3 Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95
4+ Opers	4+ Vehs	0.95	0.95	0.95	0.95	0.95	0.95	0.95

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

CONVICTION SURCHARGES

USAA

<u>Points</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
1	1.1000	1.1000	1.1000	1.1000	1.1000	1.1000	1.1000
2	1.3452	1.3193	1.3192	1.3021	1.3242	1.3290	1.3021
3	1.4371	1.4034	1.4033	1.3811	1.4097	1.4160	1.3811
4	1.5195	1.4784	1.4784	1.4514	1.4861	1.4936	1.4514
5	1.5960	1.5479	1.5479	1.5162	1.5568	1.5656	1.5162
6	1.6685	1.6134	1.6134	1.5774	1.6237	1.6337	1.5774
7	1.7380	1.6762	1.6762	1.6357	1.6877	1.6989	1.6357
8	1.8054	1.7368	1.7368	1.6920	1.7494	1.7620	1.6920
9	1.8710	1.7956	1.7957	1.7466	1.8096	1.8232	1.7466
10	1.9352	1.8533	1.8533	1.7998	1.8684	1.8833	1.7998
11	1.9984	1.9097	1.9097	1.8521	1.9260	1.9421	1.8521
12	2.0607	1.9652	1.9654	1.9034	1.9829	2.0001	1.9034
13	2.1223	2.0200	2.0201	1.9539	2.0388	2.0573	1.9539
14	2.1832	2.0742	2.0743	2.0037	2.0942	2.1139	2.0037
15	2.2437	2.1278	2.1280	2.0530	2.1491	2.1700	2.0530
16	2.3038	2.1810	2.1812	2.1019	2.2036	2.2257	2.1019
17	2.3636	2.2338	2.2340	2.1503	2.2576	2.2810	2.1503
18	2.4231	2.2863	2.2865	2.1984	2.3114	2.3359	2.1984
19	2.4824	2.3386	2.3388	2.2463	2.3649	2.3908	2.2463
20	2.5416	2.3906	2.3908	2.2939	2.4182	2.4454	2.2939
Excess Vehicle	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

For each additional point above 20 add 0.05.

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

CONVICTION SURCHARGES

CIC

<u>Points</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
1	1.1000	1.1000	1.1000	1.1000	1.1000	1.1000	1.1000
2	1.3462	1.3204	1.3203	1.3032	1.3253	1.3299	1.3032
3	1.4382	1.4045	1.4044	1.3822	1.4108	1.4170	1.3822
4	1.5208	1.4796	1.4795	1.4525	1.4874	1.4947	1.4525
5	1.5973	1.5492	1.5491	1.5174	1.5581	1.5668	1.5174
6	1.6698	1.6147	1.6147	1.5786	1.6250	1.6349	1.5786
7	1.7394	1.6775	1.6775	1.6370	1.6891	1.7002	1.6370
8	1.8068	1.7382	1.7382	1.6934	1.7509	1.7633	1.6934
9	1.8725	1.7971	1.7971	1.7480	1.8111	1.8246	1.7480
10	1.9368	1.8548	1.8548	1.8013	1.8699	1.8846	1.8013
11	2.0000	1.9112	1.9113	1.8535	1.9276	1.9435	1.8535
12	2.0624	1.9668	1.9669	1.9049	1.9845	2.0015	1.9049
13	2.1240	2.0217	2.0217	1.9554	2.0405	2.0588	1.9554
14	2.1850	2.0758	2.0759	2.0053	2.0959	2.1155	2.0053
15	2.2455	2.1295	2.1297	2.0546	2.1509	2.1715	2.0546
16	2.3056	2.1828	2.1830	2.1036	2.2054	2.2273	2.1036
17	2.3655	2.2356	2.2358	2.1520	2.2594	2.2827	2.1520
18	2.4251	2.2882	2.2884	2.2002	2.3133	2.3376	2.2002
19	2.4845	2.3405	2.3407	2.2481	2.3669	2.3925	2.2481
20	2.5436	2.3926	2.3928	2.2958	2.4202	2.4472	2.2958
Excess Vehicle	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

For each additional point above 20 add 0.05.

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

CONVICTION SURCHARGES

GIC

<u>Points</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
1	1.1500	1.1500	1.1500	1.1500	1.1500	1.1500	1.1500
2	1.3422	1.3164	1.3165	1.2993	1.3212	1.3258	1.2993
3	1.4339	1.4003	1.4004	1.3781	1.4065	1.4126	1.3781
4	1.5162	1.4752	1.4753	1.4482	1.4828	1.4901	1.4482
5	1.5925	1.5445	1.5447	1.5129	1.5533	1.5619	1.5129
6	1.6648	1.6099	1.6101	1.5739	1.6200	1.6298	1.5739
7	1.7342	1.6725	1.6727	1.6321	1.6839	1.6949	1.6321
8	1.8014	1.7330	1.7332	1.6883	1.7455	1.7578	1.6883
9	1.8669	1.7917	1.7920	1.7428	1.8055	1.8189	1.7428
10	1.9310	1.8492	1.8495	1.7959	1.8642	1.8788	1.7959
11	1.9940	1.9055	1.9058	1.8480	1.9217	1.9375	1.8480
12	2.0562	1.9609	1.9613	1.8992	1.9784	1.9953	1.8992
13	2.1176	2.0156	2.0159	1.9496	2.0342	2.0524	1.9496
14	2.1784	2.0696	2.0700	1.9993	2.0895	2.1089	1.9993
15	2.2388	2.1231	2.1236	2.0485	2.1443	2.1648	2.0485
16	2.2987	2.1762	2.1767	2.0973	2.1986	2.2204	2.0973
17	2.3584	2.2289	2.2294	2.1456	2.2525	2.2756	2.1456
18	2.4178	2.2813	2.2818	2.1936	2.3062	2.3304	2.1936
19	2.4770	2.3335	2.3340	2.2414	2.3596	2.3851	2.2414
20	2.5360	2.3854	2.3859	2.2889	2.4128	2.4396	2.2889
Excess Vehicle	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

For each additional point above 20 add 0.05.

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

CONVICTION SURCHARGES

Garrison

<u>Points</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
1	1.1000	1.1000	1.1000	1.1000	1.1000	1.1000	1.1000
2	1.3479	1.3220	1.3218	1.3048	1.3269	1.3315	1.3048
3	1.4400	1.4062	1.4060	1.3839	1.4125	1.4187	1.3839
4	1.5226	1.4814	1.4812	1.4543	1.4892	1.4965	1.4543
5	1.5992	1.5510	1.5509	1.5193	1.5600	1.5687	1.5193
6	1.6718	1.6167	1.6165	1.5805	1.6270	1.6368	1.5805
7	1.7415	1.6796	1.6794	1.6390	1.6911	1.7022	1.6390
8	1.8090	1.7403	1.7401	1.6954	1.7530	1.7654	1.6954
9	1.8748	1.7993	1.7992	1.7501	1.8133	1.8268	1.7501
10	1.9392	1.8570	1.8569	1.8035	1.8722	1.8869	1.8035
11	2.0024	1.9136	1.9134	1.8558	1.9300	1.9459	1.8558
12	2.0649	1.9692	1.9691	1.9072	1.9869	2.0039	1.9072
13	2.1266	2.0241	2.0240	1.9578	2.0429	2.0613	1.9578
14	2.1876	2.0784	2.0783	2.0077	2.0985	2.1180	2.0077
15	2.2483	2.1321	2.1321	2.0571	2.1535	2.1742	2.0571
16	2.3084	2.1854	2.1854	2.1061	2.2081	2.2300	2.1061
17	2.3684	2.2383	2.2383	2.1546	2.2622	2.2854	2.1546
18	2.4280	2.2910	2.2909	2.2028	2.3161	2.3405	2.2028
19	2.4875	2.3434	2.3433	2.2508	2.3697	2.3954	2.2508
20	2.5467	2.3955	2.3954	2.2985	2.4232	2.4501	2.2985
Excess Vehicle	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

For each additional point above 20 add 0.05.

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ACCIDENT SURCHARGES

USAA

<u>Number of Accidents</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0 Acc's	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1 Acc	1.25	1.25	1.20	1.10	1.05	1.20	1.10
2 Acc's	1.60	1.55	1.40	1.35	1.10	1.45	1.35
3 Acc's	2.00	1.95	1.60	1.65	1.15	1.85	1.65
4 Acc's	2.50	2.35	1.80	2.00	1.20	2.30	2.00
5 Acc's	3.00	2.75	2.00	2.40	1.25	2.75	2.40
6 Acc's	3.50	3.15	2.20	2.80	1.30	3.20	2.80
Each Add'l Acc*	0.50	0.40	0.20	0.40	0.05	0.45	0.40
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

*For each accident greater than 6 add the appropriate factor.

CIC

<u>Number of Accidents</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0 Acc's	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1 Acc	1.25	1.25	1.20	1.10	1.05	1.20	1.10
2 Acc's	1.60	1.55	1.40	1.35	1.10	1.45	1.35
3 Acc's	2.00	1.95	1.60	1.65	1.15	1.85	1.65
4 Acc's	2.50	2.35	1.80	2.00	1.20	2.30	2.00
5 Acc's	3.00	2.75	2.00	2.40	1.25	2.75	2.40
6 Acc's	3.50	3.15	2.20	2.80	1.30	3.20	2.80
Each Add'l Acc*	0.50	0.40	0.20	0.40	0.05	0.45	0.40
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

*For each accident greater than 6 add the appropriate factor.

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: DECEMBER 28, 2017 (NEW BUSINESS)
 DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ACCIDENT SURCHARGES

GIC

<u>Number of Accidents</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0 Acc's	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1 Acc	1.30	1.25	1.20	1.10	1.05	1.20	1.10
2 Acc's	1.60	1.55	1.40	1.35	1.10	1.45	1.35
3 Acc's	2.00	1.95	1.60	1.65	1.15	1.85	1.65
4 Acc's	2.50	2.35	1.80	2.00	1.20	2.30	2.00
5 Acc's	3.00	2.75	2.00	2.40	1.25	2.75	2.40
6 Acc's	3.50	3.15	2.20	2.80	1.30	3.20	2.80
Each Add'l Acc*	0.50	0.40	0.20	0.40	0.05	0.45	0.40
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

*For each accident greater than 6 add the appropriate factor.

Garrison

<u>Number of Accidents</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
0 Acc's	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1 Acc	1.25	1.25	1.20	1.10	1.05	1.20	1.10
2 Acc's	1.60	1.55	1.40	1.35	1.10	1.45	1.35
3 Acc's	2.00	1.95	1.60	1.65	1.15	1.85	1.65
4 Acc's	2.50	2.35	1.80	2.00	1.20	2.30	2.00
5 Acc's	3.00	2.75	2.00	2.40	1.25	2.75	2.40
6 Acc's	3.50	3.15	2.20	2.80	1.30	3.20	2.80
Each Add'l Acc*	0.50	0.40	0.20	0.40	0.05	0.45	0.40
Excess Vehicle	1.00	1.00	1.00	1.00	1.00	1.00	1.00

*For each accident greater than 6 add the appropriate factor.

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ANNUAL MILEAGE FACTORS

USAA

<u>Miles</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
500	0.51	0.52	0.50	0.65	0.86	0.59	0.65
1,000	0.51	0.52	0.55	0.65	0.86	0.63	0.65
1,500	0.59	0.57	0.59	0.65	0.86	0.67	0.65
2,000	0.64	0.62	0.65	0.69	0.86	0.71	0.69
2,500	0.68	0.68	0.69	0.72	0.86	0.74	0.72
3,000	0.71	0.72	0.75	0.75	0.86	0.76	0.75
3,500	0.75	0.76	0.81	0.78	0.86	0.77	0.78
4,000	0.78	0.79	0.81	0.80	0.86	0.79	0.80
4,500	0.79	0.82	0.82	0.83	0.87	0.80	0.83
5,000	0.82	0.84	0.84	0.85	0.88	0.81	0.85
5,500	0.84	0.86	0.87	0.86	0.89	0.84	0.86
6,000	0.86	0.89	0.90	0.88	0.91	0.87	0.88
6,500	0.88	0.91	0.92	0.89	0.92	0.88	0.89
7,000	0.89	0.93	0.94	0.91	0.93	0.89	0.91
7,500	0.91	0.95	0.97	0.92	0.95	0.91	0.92
8,000	0.92	0.96	1.00	0.93	0.96	0.92	0.93
8,500	0.94	0.98	1.00	0.95	0.97	0.95	0.95
9,000	0.95	0.98	1.00	0.96	0.98	0.96	0.96
9,500	0.96	0.99	1.00	0.97	1.00	0.97	0.97
10,000	0.97	0.99	1.00	0.98	1.00	0.97	0.98
10,500	0.98	1.00	1.00	0.99	1.00	0.99	0.99
11,000	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11,500	1.01	1.01	1.00	1.01	1.02	1.02	1.01
12,000	1.02	1.01	1.00	1.02	1.03	1.02	1.02
12,500	1.03	1.02	1.00	1.03	1.05	1.03	1.03
13,000	1.04	1.02	1.00	1.04	1.06	1.04	1.04
13,500	1.05	1.03	1.00	1.04	1.07	1.06	1.04
14,000	1.06	1.04	1.00	1.05	1.09	1.06	1.05
14,500	1.07	1.05	1.01	1.06	1.10	1.07	1.06

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ANNUAL MILEAGE FACTORS

USAA

<u>Miles</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
15,000	1.08	1.06	1.02	1.07	1.11	1.07	1.07
15,500	1.09	1.07	1.04	1.08	1.12	1.08	1.08
16,000	1.10	1.08	1.05	1.08	1.14	1.10	1.08
16,500	1.10	1.09	1.06	1.09	1.15	1.10	1.09
17,000	1.10	1.10	1.07	1.10	1.16	1.11	1.10
17,500	1.10	1.12	1.08	1.10	1.17	1.11	1.10
18,000	1.10	1.12	1.09	1.11	1.19	1.12	1.11
18,500	1.10	1.12	1.11	1.12	1.19	1.12	1.12
19,000	1.10	1.12	1.12	1.12	1.19	1.14	1.12
19,500	1.10	1.12	1.13	1.13	1.19	1.14	1.13
20,000	1.10	1.12	1.15	1.14	1.19	1.14	1.14
20,500	1.10	1.12	1.16	1.14	1.19	1.14	1.14
21,000	1.10	1.12	1.16	1.15	1.19	1.15	1.15
21,500	1.10	1.12	1.16	1.15	1.19	1.15	1.15
22,000	1.10	1.12	1.16	1.16	1.20	1.15	1.16
22,500	1.10	1.12	1.16	1.16	1.20	1.15	1.16
23,000	1.10	1.12	1.16	1.17	1.20	1.15	1.17
23,500	1.10	1.12	1.16	1.17	1.20	1.16	1.17
24,000	1.10	1.12	1.16	1.18	1.20	1.16	1.18
24,500	1.10	1.12	1.16	1.19	1.20	1.16	1.19
25,000	1.10	1.12	1.16	1.19	1.20	1.16	1.19
25,500	1.10	1.12	1.16	1.20	1.25	1.16	1.20
26,000	1.10	1.12	1.16	1.20	1.25	1.16	1.20
26,500	1.10	1.12	1.16	1.21	1.25	1.16	1.21
27,000	1.10	1.12	1.16	1.21	1.25	1.16	1.21
27,500	1.10	1.12	1.16	1.21	1.25	1.16	1.21
28,000	1.10	1.12	1.16	1.22	1.25	1.16	1.22
28,500	1.10	1.12	1.16	1.22	1.25	1.16	1.22
29,000	1.10	1.12	1.16	1.23	1.25	1.16	1.23
29,500	1.10	1.12	1.16	1.23	1.25	1.16	1.23
30,000+	1.10	1.12	1.16	1.24	1.25	1.16	1.24

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ANNUAL MILEAGE FACTORS

CIC

<u>Miles</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
500	0.44	0.49	0.44	0.59	0.86	0.56	0.59
1,000	0.44	0.49	0.50	0.62	0.86	0.60	0.62
1,500	0.53	0.54	0.56	0.65	0.86	0.65	0.65
2,000	0.60	0.60	0.61	0.67	0.86	0.69	0.67
2,500	0.64	0.65	0.67	0.70	0.86	0.72	0.70
3,000	0.68	0.70	0.72	0.73	0.86	0.74	0.73
3,500	0.72	0.74	0.79	0.74	0.86	0.76	0.74
4,000	0.75	0.77	0.79	0.77	0.86	0.77	0.77
4,500	0.77	0.80	0.81	0.79	0.87	0.79	0.79
5,000	0.80	0.83	0.83	0.81	0.88	0.80	0.81
5,500	0.82	0.85	0.86	0.84	0.90	0.83	0.84
6,000	0.84	0.88	0.89	0.86	0.91	0.86	0.86
6,500	0.86	0.90	0.92	0.87	0.92	0.87	0.87
7,000	0.88	0.92	0.94	0.89	0.94	0.89	0.89
7,500	0.90	0.94	0.97	0.91	0.95	0.90	0.91
8,000	0.91	0.96	1.00	0.92	0.96	0.91	0.92
8,500	0.93	0.98	1.00	0.94	0.97	0.94	0.94
9,000	0.95	0.98	1.00	0.95	0.99	0.96	0.95
9,500	0.96	0.99	1.00	0.96	1.00	0.97	0.96
10,000	0.97	0.99	1.00	0.98	1.00	0.97	0.98
10,500	0.99	1.00	1.00	0.99	1.00	0.99	0.99
11,000	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11,500	1.01	1.01	1.00	1.01	1.03	1.01	1.01
12,000	1.02	1.01	1.00	1.02	1.04	1.01	1.02
12,500	1.04	1.02	1.00	1.03	1.05	1.03	1.03
13,000	1.05	1.02	1.00	1.04	1.06	1.04	1.04
13,500	1.06	1.03	1.00	1.05	1.08	1.06	1.05
14,000	1.07	1.04	1.00	1.06	1.09	1.06	1.06
14,500	1.08	1.05	1.01	1.07	1.10	1.07	1.07

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ANNUAL MILEAGE FACTORS

CIC

<u>Miles</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
15,000	1.09	1.06	1.03	1.08	1.12	1.07	1.08
15,500	1.10	1.07	1.04	1.09	1.13	1.09	1.09
16,000	1.11	1.08	1.06	1.10	1.14	1.10	1.10
16,500	1.12	1.10	1.06	1.11	1.16	1.10	1.11
17,000	1.12	1.11	1.08	1.12	1.17	1.11	1.12
17,500	1.12	1.12	1.09	1.12	1.18	1.11	1.12
18,000	1.12	1.12	1.11	1.13	1.19	1.13	1.13
18,500	1.12	1.12	1.12	1.14	1.19	1.13	1.14
19,000	1.12	1.12	1.14	1.15	1.19	1.14	1.15
19,500	1.12	1.12	1.15	1.15	1.19	1.14	1.15
20,000	1.12	1.12	1.17	1.16	1.19	1.14	1.16
20,500	1.12	1.12	1.18	1.17	1.19	1.14	1.17
21,000	1.12	1.12	1.18	1.18	1.19	1.16	1.18
21,500	1.12	1.12	1.18	1.18	1.19	1.16	1.18
22,000	1.12	1.12	1.18	1.19	1.21	1.16	1.19
22,500	1.12	1.12	1.18	1.20	1.21	1.16	1.20
23,000	1.12	1.12	1.18	1.20	1.21	1.16	1.20
23,500	1.12	1.12	1.18	1.21	1.21	1.17	1.21
24,000	1.12	1.12	1.18	1.22	1.21	1.17	1.22
24,500	1.12	1.12	1.18	1.22	1.21	1.17	1.22
25,000	1.12	1.12	1.18	1.23	1.21	1.17	1.23
25,500	1.12	1.12	1.18	1.23	1.26	1.17	1.23
26,000	1.12	1.12	1.18	1.24	1.26	1.17	1.24
26,500	1.12	1.12	1.18	1.25	1.26	1.17	1.25
27,000	1.12	1.12	1.18	1.25	1.26	1.17	1.25
27,500	1.12	1.12	1.18	1.26	1.26	1.17	1.26
28,000	1.12	1.12	1.18	1.26	1.26	1.17	1.26
28,500	1.12	1.12	1.18	1.27	1.26	1.17	1.27
29,000	1.12	1.12	1.18	1.27	1.26	1.17	1.27
29,500	1.12	1.12	1.18	1.28	1.26	1.17	1.28
30,000+	1.12	1.12	1.18	1.28	1.26	1.17	1.28

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ANNUAL MILEAGE FACTORS

GIC

<u>Miles</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
500	0.45	0.47	0.52	0.58	0.74	0.52	0.58
1,000	0.45	0.47	0.55	0.58	0.74	0.52	0.58
1,500	0.54	0.53	0.58	0.58	0.74	0.52	0.58
2,000	0.61	0.59	0.61	0.63	0.76	0.55	0.63
2,500	0.65	0.63	0.64	0.67	0.79	0.59	0.67
3,000	0.69	0.68	0.68	0.71	0.79	0.62	0.71
3,500	0.72	0.73	0.70	0.73	0.82	0.66	0.73
4,000	0.76	0.76	0.74	0.77	0.83	0.69	0.77
4,500	0.79	0.80	0.77	0.79	0.85	0.73	0.79
5,000	0.81	0.83	0.81	0.81	0.87	0.76	0.81
5,500	0.83	0.85	0.83	0.83	0.89	0.80	0.83
6,000	0.86	0.88	0.87	0.86	0.91	0.83	0.86
6,500	0.88	0.90	0.90	0.88	0.92	0.86	0.88
7,000	0.89	0.92	0.94	0.89	0.94	0.88	0.89
7,500	0.91	0.94	0.96	0.90	0.95	0.90	0.90
8,000	0.93	0.96	1.00	0.92	0.96	0.91	0.92
8,500	0.95	0.98	1.00	0.94	0.96	0.94	0.94
9,000	0.96	0.98	1.00	0.95	0.97	0.95	0.95
9,500	0.96	0.99	1.00	0.96	0.97	0.97	0.96
10,000	0.97	0.99	1.00	0.97	0.99	0.97	0.97
10,500	0.98	1.00	1.00	0.99	0.99	0.98	0.99
11,000	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11,500	1.02	1.01	1.00	1.01	1.00	1.01	1.01
12,000	1.03	1.01	1.00	1.02	1.01	1.01	1.02
12,500	1.04	1.03	1.00	1.04	1.03	1.02	1.04
13,000	1.04	1.03	1.00	1.04	1.04	1.04	1.04
13,500	1.04	1.04	1.00	1.05	1.05	1.05	1.05
14,000	1.05	1.05	1.00	1.06	1.07	1.05	1.06
14,500	1.05	1.06	1.03	1.07	1.08	1.07	1.07

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ANNUAL MILEAGE FACTORS

GIC

<u>Miles</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
15,000	1.06	1.07	1.06	1.08	1.09	1.07	1.08
15,500	1.06	1.08	1.06	1.09	1.10	1.08	1.09
16,000	1.07	1.09	1.06	1.10	1.12	1.09	1.10
16,500	1.08	1.11	1.06	1.11	1.13	1.11	1.11
17,000	1.09	1.12	1.09	1.12	1.14	1.12	1.12
17,500	1.10	1.13	1.10	1.12	1.16	1.14	1.12
18,000	1.11	1.13	1.14	1.13	1.17	1.14	1.13
18,500	1.11	1.13	1.14	1.14	1.18	1.15	1.14
19,000	1.12	1.13	1.14	1.15	1.18	1.16	1.15
19,500	1.12	1.13	1.14	1.15	1.18	1.16	1.15
20,000	1.13	1.13	1.14	1.16	1.18	1.16	1.16
20,500	1.13	1.13	1.14	1.17	1.20	1.16	1.17
21,000	1.13	1.13	1.14	1.18	1.20	1.16	1.18
21,500	1.13	1.13	1.14	1.19	1.20	1.16	1.19
22,000	1.13	1.13	1.14	1.19	1.20	1.16	1.19
22,500	1.13	1.13	1.14	1.19	1.20	1.16	1.19
23,000	1.13	1.13	1.14	1.20	1.20	1.16	1.20
23,500	1.13	1.13	1.14	1.21	1.20	1.16	1.21
24,000	1.13	1.13	1.14	1.21	1.20	1.16	1.21
24,500	1.13	1.13	1.14	1.22	1.20	1.16	1.22
25,000	1.13	1.13	1.14	1.23	1.20	1.16	1.23
25,500	1.13	1.13	1.14	1.23	1.23	1.20	1.23
26,000	1.13	1.13	1.14	1.24	1.23	1.20	1.24
26,500	1.13	1.13	1.14	1.25	1.23	1.20	1.25
27,000	1.13	1.13	1.14	1.25	1.23	1.20	1.25
27,500	1.13	1.13	1.14	1.26	1.23	1.20	1.26
28,000	1.13	1.13	1.14	1.27	1.23	1.20	1.27
28,500	1.13	1.13	1.14	1.27	1.23	1.20	1.27
29,000	1.13	1.13	1.14	1.27	1.23	1.20	1.27
29,500	1.13	1.13	1.14	1.27	1.23	1.20	1.27
30,000+	1.13	1.13	1.14	1.28	1.23	1.20	1.28

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ANNUAL MILEAGE FACTORS

Garrison

<u>Miles</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
500	0.48	0.40	0.41	0.58	0.86	0.53	0.58
1,000	0.48	0.46	0.41	0.58	0.86	0.53	0.58
1,500	0.54	0.52	0.46	0.58	0.86	0.58	0.58
2,000	0.60	0.58	0.51	0.63	0.86	0.62	0.63
2,500	0.64	0.65	0.59	0.67	0.86	0.67	0.67
3,000	0.68	0.71	0.72	0.71	0.86	0.71	0.71
3,500	0.71	0.73	0.74	0.73	0.86	0.74	0.73
4,000	0.75	0.76	0.76	0.77	0.86	0.74	0.77
4,500	0.77	0.78	0.77	0.79	0.87	0.76	0.79
5,000	0.80	0.79	0.81	0.81	0.88	0.76	0.81
5,500	0.82	0.83	0.83	0.83	0.90	0.82	0.83
6,000	0.84	0.86	0.87	0.86	0.91	0.82	0.86
6,500	0.86	0.88	0.90	0.88	0.92	0.85	0.88
7,000	0.88	0.90	0.94	0.89	0.94	0.85	0.89
7,500	0.89	0.93	0.97	0.90	0.95	0.88	0.90
8,000	0.91	0.95	1.00	0.92	0.96	0.88	0.92
8,500	0.93	0.97	1.00	0.94	0.98	0.91	0.94
9,000	0.94	0.97	1.00	0.95	0.99	0.91	0.95
9,500	0.96	0.98	1.00	0.96	1.00	0.94	0.96
10,000	0.97	0.98	1.00	0.97	1.00	0.97	0.97
10,500	0.98	1.00	1.00	0.99	1.00	0.99	0.99
11,000	1.00	1.00	1.00	1.00	1.00	1.00	1.00
11,500	1.01	1.01	1.00	1.01	1.03	1.02	1.01
12,000	1.02	1.01	1.00	1.02	1.04	1.02	1.02
12,500	1.04	1.02	1.00	1.04	1.05	1.03	1.04
13,000	1.04	1.02	1.00	1.04	1.07	1.05	1.04
13,500	1.05	1.04	1.02	1.05	1.08	1.06	1.05
14,000	1.06	1.05	1.02	1.06	1.09	1.08	1.06
14,500	1.08	1.06	1.06	1.07	1.11	1.09	1.07

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **DECEMBER 28, 2017 (NEW BUSINESS)**
DECEMBER 28, 2017 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

ANNUAL MILEAGE FACTORS

Garrison

<u>Miles</u>	<u>BI</u>	<u>PD</u>	<u>MP</u>	<u>UM</u>	<u>CP</u>	<u>CL</u>	<u>WOCD</u>
15,000	1.09	1.08	1.10	1.08	1.12	1.11	1.08
15,500	1.10	1.09	1.10	1.09	1.13	1.11	1.09
16,000	1.11	1.10	1.10	1.10	1.14	1.11	1.10
16,500	1.11	1.10	1.10	1.11	1.16	1.11	1.11
17,000	1.11	1.12	1.13	1.12	1.17	1.11	1.12
17,500	1.11	1.13	1.17	1.12	1.18	1.11	1.12
18,000	1.11	1.13	1.19	1.13	1.20	1.11	1.13
18,500	1.11	1.13	1.19	1.14	1.20	1.11	1.14
19,000	1.11	1.13	1.19	1.15	1.20	1.11	1.15
19,500	1.11	1.13	1.19	1.15	1.20	1.11	1.15
20,000	1.11	1.13	1.19	1.16	1.20	1.11	1.16
20,500	1.11	1.13	1.21	1.17	1.20	1.14	1.17
21,000	1.11	1.13	1.21	1.18	1.20	1.17	1.18
21,500	1.11	1.13	1.21	1.19	1.20	1.17	1.19
22,000	1.11	1.13	1.21	1.19	1.21	1.17	1.19
22,500	1.11	1.13	1.21	1.19	1.21	1.17	1.19
23,000	1.11	1.13	1.21	1.20	1.21	1.17	1.20
23,500	1.11	1.13	1.21	1.21	1.21	1.18	1.21
24,000	1.11	1.13	1.21	1.21	1.21	1.18	1.21
24,500	1.11	1.13	1.21	1.22	1.21	1.18	1.22
25,000	1.11	1.13	1.21	1.23	1.21	1.18	1.23
25,500	1.11	1.13	1.21	1.23	1.26	1.18	1.23
26,000	1.11	1.13	1.21	1.24	1.26	1.18	1.24
26,500	1.11	1.13	1.21	1.25	1.26	1.18	1.25
27,000	1.11	1.13	1.21	1.25	1.26	1.18	1.25
27,500	1.11	1.13	1.21	1.26	1.26	1.18	1.26
28,000	1.11	1.13	1.21	1.27	1.26	1.18	1.27
28,500	1.11	1.13	1.21	1.27	1.26	1.18	1.27
29,000	1.11	1.13	1.21	1.27	1.26	1.18	1.27
29,500	1.11	1.13	1.21	1.27	1.26	1.18	1.27
30,000+	1.11	1.13	1.21	1.28	1.26	1.18	1.28

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **AUGUST 5, 2009 (NEW BUSINESS)**
AUGUST 5, 2009 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

MOTORCYCLES

GROUP

The table below reflects the appropriate factor to apply to the Private Passenger Automobile base premiums.

<u>ISO Stat Code</u>	<u>Engine Size</u>	<u>BI</u>	<u>PD</u>	<u>CP</u>	<u>CL</u>
9231	0-50 cc	0.12	0.12	0.17	0.06
9231	51-100 cc	0.12	0.12	0.17	0.06
9232	101-200 cc	0.16	0.16	0.29	0.12
9233	201-300 cc	0.20	0.20	0.38	0.18
9233	301-360 cc	0.24	0.24	0.44	0.24
9234	361-450 cc	0.24	0.24	0.44	0.24
9234	451-500 cc	0.28	0.28	0.56	0.30
9235	501-600 cc	0.28	0.28	0.56	0.30
9235	601-750 cc	0.32	0.32	0.65	0.42
9235	751-800 cc	0.36	0.36	0.75	0.59
9236	801-1000 cc	0.36	0.36	0.75	0.59
9236	Over 1000 cc	0.44	0.44	0.81	0.71

Factors for the following coverages apply to the Private Passenger Auto Rate.

GROUP

UMUIMBI	2.00
UMPD	2.00
MP	2.40
WoCD	2.00

State: **CALIFORNIA**
 Line of Business: **AUTO**
 Effective: **AUGUST 5, 2009 (NEW BUSINESS)**
AUGUST 5, 2009 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
USAA CASUALTY INSURANCE COMPANY
USAA GENERAL INDEMNITY COMPANY
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OTHER MISCELLANEOUS VEHICLES

Antique Factors

<u>Coverage</u>	<u>GROUP</u>
BI	0.40
UMUIMBI	1.00
UMPD	1.00
MP	1.00
EB	1.00
PD	0.40

Electric Vehicle Factors

<u>Coverage</u>	<u>GROUP</u>
BI	0.75
UMUIMBI	1.00
UMPD	1.00
MP	1.00
EB	1.00
PD	0.75
CP	1.00
CL	1.00
RR	1.00
T&L	1.00
WoCD	1.00

Motor Home Factors

<u>Coverage</u>	<u>GROUP</u>
BI	0.50
UMUIMBI	1.00
UMPD	1.00
MP	0.50
EB	1.00
PD	0.50
CP	0.50
CL	0.50
T&L	1.00
WoCD	1.00

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 Effective: **AUGUST 5, 2009 (NEW BUSINESS)**
AUGUST 5, 2009 (RENEWAL BUSINESS)
 Companies: **UNITED SERVICES AUTOMOBILE ASSOCIATION**
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OTHER MISCELLANEOUS VEHICLES

Snowmobile Factors

<u>Coverage</u>	<u>GROUP</u>
BI	0.50
UMUIMBI	1.00
UMPD	1.00
MP	2.00
PD	0.50
WoCD	1.00

Snowmobile Comprehensive Rates

<u>USAA</u>	<u>USAA-CIC</u>	<u>USAA-GIC</u>	<u>Garrison</u>
21.00	25.60	33.52	25.60

Snowmobile Collision Rates

<u>USAA</u>	<u>USAA-CIC</u>	<u>USAA-GIC</u>	<u>Garrison</u>
20.00	19.24	26.88	19.24

Golfcart Factors

<u>Coverage</u>	<u>GROUP</u>
BI	0.05
UMUIMBI	0.50
UMPD	0.50
MP	0.50
PD	0.05
WoCD	0.50

Golfcart Expense Fees

<u>Coverage</u>	<u>GROUP</u>
BI	4.00
PD	4.00

Golfcart Comprehensive Rates

<u>USAA</u>	<u>USAA-CIC</u>	<u>USAA-GIC</u>	<u>Garrison</u>
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10.00	12.19	15.96	12.19
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Golfcart Collision Rates

<u>USAA</u>	<u>USAA-CIC</u>	<u>USAA-GIC</u>	<u>Garrison</u>
5.00	4.81	6.72	4.81

Named Nonowner Factors

<u>Coverage</u>	<u>GROUP</u>
BI	0.50
UMUIMBI	1.00
MP	0.50
PD	0.50

Recreational Trailer Comprehensive Rates per \$100 of coverage

<u>USAA</u>	<u>USAA-CIC</u>	<u>USAA-GIC</u>	<u>Garrison</u>
0.50	0.61	0.80	0.61

Recreational Trailer Collision Rates

<u>Value</u>	<u>USAA</u>	<u>USAA-CIC</u>	<u>USAA-GIC</u>	<u>Garrison</u>
\$0-600	5.26	5.07	7.07	5.07
\$601-1,050	6.58	6.33	8.84	6.33
\$1,051-1,300	7.89	7.59	10.61	7.59
\$1,301-1,600	9.21	8.86	12.38	8.86
\$1,601-1,900	10.53	10.13	14.14	10.13
\$1,901-2,400	11.84	11.39	15.91	11.39
\$2,401-3,000	14.47	13.92	19.45	13.92
\$3,001-4,000	17.76	17.09	23.88	17.09
\$4,001-5,000	22.37	21.52	30.07	21.52
\$5,001-6,000	26.32	25.32	35.37	25.32
\$6,001-7,000	30.26	29.11	40.67	29.11
\$7,001-8,000	34.87	33.55	46.86	33.55
\$8,001-9,000	38.82	37.34	52.17	37.34
\$9,001-10,000	43.42	41.77	58.36	41.77
each add'l \$1,000 over \$10,000	4.34	4.18	5.84	4.18

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Other Trailer Comprehensive Rates per \$100 of coverage

<u>USAA</u>	<u>USAA-CIC</u>	<u>USAA-GIC</u>	<u>Garrison</u>
0.49	0.59	0.77	0.59

Other Trailer Collision Rates

<u>Value</u>	<u>USAA</u>	<u>USAA-CIC</u>	<u>USAA-GIC</u>	<u>Garrison</u>
\$0-400	1.32	1.26	1.77	1.26
\$401-600	2.63	2.53	3.54	2.53
\$601-800	3.29	3.16	4.42	3.16
\$801-1,000	3.95	3.80	5.30	3.80
\$1,001-1,500	6.58	6.33	8.84	6.33
\$1,501-2,000	7.89	7.59	10.61	7.59
\$2,001-2,500	9.21	8.86	12.38	8.86
\$2,501-3,000	11.84	11.39	15.91	11.39
\$3,001-3,500	13.16	12.66	17.68	12.66
\$3,501-4,000	14.47	13.92	19.45	13.92
\$4,001-4,500	16.45	15.82	22.11	15.82
\$4,501-5,000	17.76	17.09	23.88	17.09
\$5,001-5,500	19.74	18.99	26.53	18.99
\$5,501-6,000	21.05	20.25	28.30	20.25
\$6,001-6,500	22.37	21.52	30.07	21.52
\$6,501-7,000	24.34	23.41	32.72	23.41
\$7,001-7,500	25.66	24.68	34.49	24.68
\$7,501-8,000	27.63	26.58	37.14	26.58
\$8,001-8,500	28.95	27.85	38.91	27.85
\$8,501-9,000	30.26	29.11	40.67	29.11
\$9,001-9,500	32.24	31.01	43.33	31.01
\$9,501-10,000	33.55	32.28	45.09	32.28
each add'l \$500 over \$10,000	1.32	1.26	1.77	1.26

1. DEFINITIONS
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3. PREMIUM DETERMINATION
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17. EXTENDED NON-OWNED LIABILITY COVERAGE
18. INCREASED LIMITS
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1. DEFINITIONS

- A. 1. A private passenger auto is a four wheel motor vehicle, other than a truck type, owned or leased for at least six months and not used commercially.
2. A pickup or van shall be considered a private passenger auto if not customarily used in business other than farming or transporting equipment of an artisan.
3. A motor vehicle owned by a farm family co-partnership or corporation shall be considered a private passenger auto if garaged on a farm and otherwise meets definitions 1 and 2 above.
4. A pickup or van used by an employee in the business of the U.S. Government may be considered a private passenger auto if not customarily used in any other business except farming, and coverage is limited with the applicable endorsement.
- B. AUTO refers to any vehicle defined in A.
- C. COMPREHENSIVE refers to other than collision coverage.
- D. TOTAL BASE PREMIUM is used for operator assignment and is based on Bodily Injury, using the following formulas:
1. For Vehicles: $\text{Base Rate} \times \text{Pure Premium Band Relativity} \times \text{Increased Limit Relativity} \times \text{Liability Symbol Relativity} \times \text{Model Year Relativity} \times \text{Vehicle Age Relativity} \times \text{Annual Mileage Factor} \times \text{Usage Factor} \times \text{Storage Discount}$.
2. For Operators: $\text{Years Driving Experience Factor} \times \text{Gender Factor} \times \text{Marital Status Factor} \times \text{Driver Training Discount} \times \text{Good Student Discount} \times \text{Mature Driver Improvement Course Discount} \times \text{Occasional Operator Discount} \times \text{Away at School Discount} \times \text{Accident Factor} \times \text{Conviction Factor} \times \text{Premier Operator Discount} \times \text{Good Driver Discount}$.
- E. LIVING AREA must have facilities for eating and sleeping.
- F. ANNUAL MILEAGE as used in this manual means the insured's estimate of total number of miles a vehicle will be driven each year.

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2. PERSONAL AUTO POLICY--ELIGIBILITY

A Personal Auto Policy shall be used for motor vehicles defined in Rule 1 and for motorcycles, motor homes, snowmobiles, golf carts or similar vehicles. It shall be used for a Named Non-owner Policy provided coverage is limited in accordance with the applicable endorsement.

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3. PREMIUM DETERMINATION

- A. Bodily Injury and Property Damage Liability, Medical Payments, Uninsured Motorists Bodily Injury and Property Damage Liability, Waiver of Collision Deductible, Comprehensive, and Collision premiums are determined on a per-vehicle basis as follows:
1. Determine the statewide base rate for each coverage
 2. Adjust the rate in step 1. by the appropriate increased limits factor to determine the Adjusted Base Rate.
 3. Multiply the Adjusted Base Rate by the Pure Premium Band Relativity. Refer to the Pure Premium Band Factor Pages to determine the Geographic definitions and rating factors which apply to each applicable coverage.
 4. Multiply the product of Step 3. by the rating factors assigned to the vehicle. Refer to Rule 4., Classifications, and the Classification Factor Page to determine the Rating Factors applicable to each operator and vehicle.
 5. Adjust the rate obtained in Step 4. for the coverage-specific multiplicatives found in the Classification Factor Page.
 6. For Bodily Injury, Property Damage Liability, Medical Payments coverages for 1998 and subsequent model years, multiply by the appropriate Liability and Medical Payments Vehicle Rating Factor. The Liability and Medical Payments Vehicle Rating Factors do not apply to risks rated in accordance with Rule 16., Named Non-Owner Policy, or Rule 17., Extended Non-Owned Liability Coverage.
- B. For all coverages NOT listed in A. above, rates are not subject to modification by the Classification Rules or any classifications factors. Good Driver Discount (GDD) applies to all coverages, whether otherwise class rated or not.
- C. Car Symbol Determination
1. Model years 1998 and later will use USAA Symbols as provided in the manual. Model years 1997 and earlier will continue the use of ISO physical damage symbols as published in the ISO Symbol and Identification (S&I) Manual.
 2. New vehicle models and/or model years will be assigned symbols based on their vehicle characteristics using the same methodology as current vehicles. The assigned symbols will be appended into the symbol assignment database as their vehicle characteristics are made available from our vendor. We will include the new vehicles and their assigned symbols in periodic updates to the filed symbol assignment pages.
 3. If no Rating Symbol is found in the symbol assignment database or in the ISO Symbol and Identification (S&I) Manual, use the following procedure to determine an interim rating symbol:
 - a. If the symbol assignment database has a rating symbol for the PRIOR MODEL YEAR version of the same vehicle, use the prior model year's symbol for the new model year vehicle.
 - b. If the symbol assignment database does NOT have a rating symbol for the PRIOR MODEL YEAR version of the same vehicle, assign physical damage symbols based on the cost new of the auto, using the appropriate price to symbol chart located in the manual and assign neutral liability symbols.

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3. PREMIUM DETERMINATION (Cont'd)

C. Car Symbol Determination and Make-Model Adjustment (Cont'd)

2. Make-Model Adjustment

For each insured vehicle, select the appropriate factor for each coverage from the Make and Model Chart displayed on state rate pages.

If no factor is shown for the make and model of the vehicle, use the following procedure to determine the make and model factor:

- a. If the Make and Model Chart displays a factor for the PRIOR MODEL YEAR version of the same vehicle, use the prior model year's factor for the new model year vehicle.
- b. If the Make and Model Chart does NOT display a factor for the PRIOR MODEL YEAR version of the same vehicle, assign a factor of 1.00.

D. Panel Truck, Pickup and Van Symbol Determination

1. Liability and Physical Damage: Rate as private passenger auto. For non-symbolled pickups, determine a symbol based on original cost new from the tables on Page 1 of the S&I Section.
2. When a pickup is used to transport a non-permanently attached camper body, or to transport a camper body or cover with no facilities for cooking and sleeping:
 - (i) Add the cost of the camper body or cover to the cost of the pickup and determine a symbol from the tables on Page 1 of the S&I Identification Section, and
 - (ii) Rate according to Paragraph D. 1. above.
3. When a pickup is used to transport a permanently attached camper body with facilities for cooking and sleeping, refer to the motor homes section of the Miscellaneous Types Rule.

E. Expense fees:

1. refer to state rate sheets to determine the applicable expense fees and add to premium for each applicable coverage;
2. are subject to the cancellation provisions;
3. are applicable to the rates for miscellaneous type vehicles as follows:
 - a. motorcycles, mopeds, electric autos and motor homes - add to all applicable coverages;
 - b. snowmobiles, golfcars and antique autos - add to the liability rates only.

F. Good Driver Discount

If the vehicle qualifies for a Good Driver Discount, as determined in the Good Driver Discount rule, multiply the total premium for all coverages applicable to the vehicle by the GDD factor found in the Classification Factor Page.

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RULE 4. CLASSIFICATIONS

References in this rule to the term “vehicle” should be interpreted as referring also to autos, motorcycles, antique autos, electric vehicles, all terrain vehicles, dune buggies, kit cars and replicas.

Vehicles owned by corporations, co-partnerships, or unincorporated associations are classified and rated using this rule.

A. The Classification Process

Determine the Rated Vehicle/Rated Driver Relationship

Only one driver will be designated as the Rated Driver of a vehicle, and that driver will not be used in the rating of any other vehicle on the policy.

A four-step process is used to determine the Rated vehicle/Rated Driver relationship as follows:

1. Determine the Highest Rated Vehicle (HRV). The HRV is the vehicle which develops the highest Total Base Premium, based on Bodily Injury. Use this criterion to create a hierarchy of highest to lowest rated vehicles.
2. Determine the Highest Rated Driver (HRD). The HRD is the driver who develops the highest Total Base Premium, based on Bodily Injury. Use this criterion to create a hierarchy of highest to lowest rated drivers.
3. Assign drivers

As used in this section:

Principal Operator is an operator who is a registered owner, drives to work or school, has a vehicle away at school, drives a particular vehicle more than any other vehicle or drives one vehicle more than any other resident operator.

Occasional Operator is a “non-principal” operator who is not limited to the use of one vehicle, is not a registered owner, does not drive to work or school on a regular basis, and does not have a vehicle away at school.

Excess Vehicle is a vehicle to which no driver has been assigned because there are more vehicles on a policy than operators.

a. Temporarily assign:

1. principal operators to the vehicle(s) they operate and;
 2. occasional operators in order of HRD to HRV until all occasional operators have been temporarily assigned to a vehicle.
- b. For each vehicle with both a principal and occasional operator, compare temporarily assigned operators and rate the HRD.

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RULE 4. CLASSIFICATIONS (Cont'd)

- c. Create a hierarchy of HRD's using remaining unassigned operators. Rate HRD's on HRV's.
- d. Rate remaining excess vehicles as noted in paragraph 4. below.

4. Excess vehicles.

Excess vehicles will be rated using the excess vehicle factor as shown in the rate pages for Driver Training, Good Student, Principal/Occasional Operator, Convictions, Accidents, Years Driving Experience, Gender and Marital Status.

Apply the Good Driver Discount factor if at least one operator on the policy qualifies as a Good Driver. Apply the Premier Operator Discount if at least one operator on the policy qualifies as a Premier Operator. Apply Mature Driver Improvement Course discount to excess vehicles meeting the criteria in Rule 4.B.14.

Use the appropriate factor for all other rating variables.

B. Classification Definitions

The classification factors applicable to each classification category specified in this rule are provided on the Classification Factor and Band Factor pages.

Refer to Section A.4., to classify autos in excess of the number of operators on the policy.

1. Convictions

For each driver, determine the number of traffic violation convictions in the 3 year period immediately preceding the effective date of the policy.

To determine the number of traffic violation convictions, we will use the public record of traffic violation convictions available from the CA Department of Motor Vehicles, together with similar public records of traffic violation convictions that are available from other jurisdictions.

The Convictions classification factor shall reflect only the conviction record of the Rated Driver of the auto.

2. Accidents

For each driver, determine the number of principally at-fault accidents in the three year period immediately preceding the effective date of the policy. California Title 10 Section 2632.13(i) states that if there is no contrary information from an independent source, a driver's declaration attesting to his or her at-fault accident history shall be sufficient proof of that accident history.

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RULE 4. CLASSIFICATIONS (Cont'd)

A driver shall be considered principally at-fault in an accident if the driver's actions or omissions were at least 51% of the legal cause of the accident, subject to the EXCEPTIONS below, and if the total loss or damage caused by the accident exceeded \$1000 or resulted in death

The Accidents classification factor shall reflect only the principally at-fault accidents of the Rated Driver of the auto.

EXCEPTIONS: a driver shall not be considered to be principally at-fault if the accident occurred under any of the following circumstances:

- a. the vehicle was lawfully parked at the time of the accident. A vehicle rolling from a parked position shall not be considered to be lawfully parked, but shall be considered as in the operation of the last operator; or
- b. the vehicle was struck in the rear by another vehicle, and the driver has not been convicted of a moving traffic violation in connection with the accident; or
- c. the driver was not convicted of a moving traffic violation and the operator of another vehicle in the accident was convicted of a moving traffic violation; or
- d. the driver's vehicle was damaged as a result of contact with a vehicle operated by a "hit and run" operator of another vehicle, and the accident was reported to legal authorities within a reasonable time after the accident; or
- e. the accident resulted from contact with animals, birds, or falling objects; or
- f. the driver was responding to a call of duty as a paid or volunteer member of any police or fire department, first aid squad, or any law enforcement agency, while performing any other governmental function in a public emergency.
- g. The accident was a solo vehicle accident that was principally caused by a hazardous condition of which a driver, in the exercise of reasonable care, would not have noticed (for example "black ice") or in the exercise of reasonable care could not have been avoided (for example avoiding a child running into the street).

3. Annual Mileage

Vehicle annual mileage is based on an estimate by the insured of the number of miles to be driven for the 12 month period following the policy inception.

For new business or for vehicles added during a policy term, the insured shall provide the miles he or she expects each vehicle to be driven during the 12 month period following the policy inception or addition of the vehicle. If the insured does not provide USAA with this information, the policy will be issued or the vehicle will be added using a default mileage of 12,000. USAA may require, information from the applicant during this process necessary to support the estimate.

During the renewal process, at least every 3 years, USAA will request that the named insured provide the estimated annual mileage he or she expects each vehicle will be driven for the 12 month period following the policy renewal. If the insured provides this updated estimate, we will renew the policy using this new mileage figure. If, during the renewal process, we do not receive the new estimated annual mileage in response to our request, USAA may do as follows:

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RULE 4. CLASSIFICATIONS (Cont'd)

We will renew the policy using the mileage figure from the expiring policy if that figure is greater than 5,000 miles. If the mileage figure from the expiring policy is 5,000 miles or less, we will request that the named insured provide information (as set forth in (C) of section 2632.5(c)(2)) necessary to support the figure from the expiring policy. If the requested information is received, we will renew the policy using the updated information. If the requested information is not received, we will renew at the default mileage of 12,000 miles.

USAA may establish a verified mileage program through which the annual mileage will be verified through other sources such as with the use of a technological device that will accurately collect vehicle mileage information. The device may be provided by USAA or otherwise made available to the insured.

Refer to the Classification Factor Page for categories and factors.

4. Years Driving Experience

This factor shall be based on the number of years of driving experience that the rated operator has been licensed to drive in any jurisdiction.

5. Gender

Gender of the rated operator.

6. Marital Status

Marital Status of the rated operator.

For the purposes of this rule, married means a married person living with his/her spouse or registered domestic partner, or a widowed person.

7. Occasional Operator Discount

A principal operator is one who is a registered owner, drives to work or school, has a vehicle away at school, or drives one vehicle more than any other resident operator.

An occasional operator is one who is not limited to the use of one vehicle, is not a registered owner, does not drive to work or school, does not have a vehicle away at school, drives no particular vehicle more than any other vehicle, or drives a particular vehicle more than any other vehicle.

8. Away at School Discount

If a rated operator is an Occasional Operator with a maximum of 14 years of driving experience and is a full-time student residing at an educational institution without a vehicle over 100 miles from home, apply Away at School discount factor as shown on state rate pages.

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RULE 4. CLASSIFICATIONS (Cont'd)

9. Multi-Car Factor

Determine the total number of operators and vehicles on the policy. For vehicles, count the number of cars, trucks, vans, SUVs, kit cars, replicas, antique autos, electric autos, motorcycles, and handmade vehicles. Select the appropriate factor for each coverage from the Multi-Car Factor Table displayed on the State Rate Pages.

10. Vehicle Use

The Vehicle Use factor shall be based on the actual use of the auto by the principal operator, or by the operator who uses the auto most frequently; regardless of rated operator usage.

- a. "Business use" means that the use of the auto is required by or customarily involved in the duties of the person who customarily operates the auto, in an occupation, profession or business, other than going to or from the principal place of occupation, profession or business.

An auto owned and principally operated by a member of the clergy is rated under the "Other Use" category.

- b. "Farm use" means the auto is principally garaged on a farm or ranch, and
- (i) it is not customarily used in going to or from work other than farming or ranching or driving to or from school and
 - (ii) it is not customarily used in any occupation other than farming or ranching.
- c. "Other Use" means the auto is principally driven for pleasure or to or from work or school.
- d. A person in active military service is not considered a household resident unless the person customarily operates the auto.
- e. Autos used by federal government employees: For Bodily Injury, Property Damage, UMBI and UMPD coverages, an auto used in the business of the U. S. Government by one of its employees may be classified as "other use" when the Federal Employees Using Autos in Government Business Endorsement is used to limit coverage.

11. Vehicle Characteristics

- a. Antitheft Device (Comprehensive Only)

Vehicle Recovery System

This factor shall be afforded on vehicles equipped with this system. This is an electronic unit installed in a vehicle that is activated after that vehicle is stolen. When activated the device provides information to a law enforcement official or another public entity regarding the vehicle's location. The system provides for the routine delivery of the information to the appropriate law enforcement to assist in the recovery of the vehicle. Select the applicable discount factor from the Miscellaneous Discount Factors Section of the state rate pages.

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RULE 4. CLASSIFICATIONS (Cont'd)

b. Military Installation Garaging

A discount on Comprehensive and Collision coverages shall be afforded on vehicles garaged on a military installation and owned by active duty military personnel. Select the applicable discount factor from the Miscellaneous Discount Factors Section of the state rate pages.

c. Passive Restraint Device (Medical Payments Only)

Determine the appropriate passive restraint device factor depending on whether the vehicle is equipped with a passive restraint device meeting the criteria below. Refer to the Classification Factor Page for categories and factors.

To qualify, the private passenger auto must be equipped with a factory-installed automatic occupant restraint, conforming to the federal crash protection requirements, and meeting the criteria of either paragraph a., b., or c. below:

- a. Driver-side airbag
- b. Driver and passenger side airbags
- c. Passive seat belts
- d. No eligible safety equipment.

d. Vehicle Injury Rating Factor (1985 through 1997 Model Years)

The potential loss experience of a motor vehicle will affect the rates for Medical Payments as follows:

For these vehicles with significantly better personal injury loss experience, a discount will be afforded; for those vehicles with significantly worse personal injury loss experience, a surcharge will be applied.

Refer to Vehicle Injury Rating Factor Section for the appropriate factor.

- a. For model years that are not displayed, use the VIR factor for the most recent model year shown for that vehicle.
- b. If the model is not displayed, use the factor for the closest comparable vehicle.
- c. If there is no current comparable vehicle, assign an interim factor of 1.00 until the factor is determined and displayed.

12. Driver Training

A Rated Driver is eligible for the driver training discount if licensed to drive for less than 3 years, and insured's confirmation that such driver has successfully completed a driver education course meeting the following standards:

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- a. The course included a minimum of 30 clock hours of classroom instruction plus a minimum of 6 clock hours of actual driving experience per student. These requirements may be met in either of the following ways:
 - (i) A minimum of 6 clock hours per student of actual driving experience exclusive of observation-time in the car. In this case, part of the required 30 clock hours of classroom instruction can be met by time spent in an approved simulated practice driving trainer authorized by the appropriate governmental department.
 - (ii) A minimum of 3 clock hours per student of actual driving experience exclusive of observation time in the car and a minimum of 12 clock hours per student in an approved practice driving trainer. In this case, only time spent in excess of 12 clock hours may be counted as part of the required 30 clock hours of classroom instruction and the use of the trainer must be authorized as in (i) above.
- b. The course was conducted by instructors certified by the appropriate government agency and was conducted by a school that had the approval of the appropriate government agency, or the course was conducted by a commercial driving school under the jurisdiction of the motor vehicle department, provided that by statute or regulation such school meets the same requirements as schools having official sanction from the responsible state educational agency.
- c. Other requirements for new driver training as approved by the state of California

13. Good Student Discount

This factor shall be based on the Rated Driver's eligibility for the Good Student Discount.

A Rated Driver is eligible for the Good Student Discount if:

1. He/she has been licensed to drive for less than 10 years and is a full time high school, college or university student; and
2. The student has met one of the following requirements during the school term immediately preceding the policy or renewal effective date:
 - (a) in the upper 20% of the class scholastically; or
 - (b) maintained a "B" average; in a numerical system, maintained a 3.0 average on a 4.0 point scale; or
 - (c) the student is included in a "Dean's List" or "Honor Roll" indicating scholastic achievement; and

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RULE 4. CLASSIFICATIONS (Cont'd)

14. Mature Driver Improvement Course Discount

A 5% Mature Driver Improvement Course Discount shall be applied to the premiums for Bodily Injury and Property Damage Liability coverages applicable to the insured motor vehicle provided the principal operator:

- a. Is age 55 or older, and
- b. has provided a completion certificate dated within the most recent 36 months certifying that he or she has successfully completed a Mature Driver Improvement Course approved by the California Department of Motor Vehicles, and
- c. during the most recent 3 years has not been:
 - (i) involved in an at-fault auto accident, or
 - (ii) convicted of a violation of Division 11 of the Vehicle Code, except Chapter 9 of that Division, or of a traffic related offense involving alcohol or narcotics.

The discount will not be provided if the insured is taking the course pursuant to a court order.

- d. This discount shall apply:
 - (i) to new and renewal policies with an inception date within the 3 year period following the course completion date.
 - (ii) only to the motor vehicle principally operated by the insured with the course completion certificate.
 - (iii) only once to each such motor vehicle regardless of the number of operators with course completion certificates.

15. Pure Premium Band (All class-rated coverages)

Refer to the Pure Premium Band Definitions to determine the relativity that applies for each coverage, for the zip code in which the auto is principally garaged.

If the mailing address differs from the location of principal garaging, use the location of principal garaging.

The Pure Premium Band Definitions were established using zip code boundaries as of first quarter 2016. The band definitions were created using data provided by TomTom, consisting of TomTom's proprietary North America Multinet Post product, which includes Geographic Information Systems (GIS) data for all point and polygon ZIP codes in the 50 U.S. states. The 2016.03 release of this product was used to create the territories. The geographic areas of the band definitions have not changed since they were originally created and they do not change as the USPS changes zip code boundaries.

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On policy issue and renewal, the garaging location is determined by “geocoding” the garaging address to a latitude/longitude coordinate on the Earth. This process occurs via a geocoding web service based on the StreetMap Premium for ArcGIS address locator product from the vendor Esri. The product is updated three times a year. This product is a composite address locator (deployed and maintained in the USAA system) that searches multiple locators to find the most accurate latitude/longitude match for the address. The locator match levels (“geo-levels”) currently used in USAA’s rating territory GIS system are (in decreasing order of relative accuracy): PARCEL, ADDRESS, ZIP+4, ZIP+2, and ZIP. (See Addendum A for a more detailed explanation of these geo-levels.) After the location is determined, the territory is assigned through one of the two methods below:

Method 1: At USAA only the PARCEL, ADDRESS, and ZIP+4 geo-levels are considered accurate enough for rating purposes. If the garaging address is geocoded to one of these levels, our system will use the latitude/longitude coordinate returned with this match. Our system will only return one match, with one corresponding geo-level and one latitude/longitude coordinate. This coordinate is then passed into a second web service operation, which overlays it onto a GIS polygon layer that represents the rating territories and finds the territory that the point falls within. Only one territory will be returned from this operation.

Method 2: If the garaging address geocodes to the ZIP or ZIP+2 level, an alternative method is used to determine the rating territory since these geo-levels are not considered precise enough for rating. In this case, another web service operation is called, in which the ZIP code from the garaging address is overlaid onto the territory layer and all territories that intersect this ZIP code polygon are returned. Multiple territories can be returned from this operation – if this happens, we select the territory with the lowest Bodily Injury rating factor and assign that territory to the member.

Addendum 1: Explanation of Geo-Level Types

PARCEL: Latitude/longitude coordinates are accurate to the address level.

ADDRESS: Latitude/longitude coordinates are accurate to the street level.

ZIP+4: Latitude/longitude coordinates represent the centroid of the 9-digit ZIP Code (e.g., 92373-8100).

ZIP+2: Latitude/longitude coordinates represent the centroid of the 7-digit ZIP Code (e.g., 92373-81).

ZIP: Latitude/longitude coordinates represent the centroid of the 5-digit ZIP Code (e.g., 92373).

16. Good Driver Discount

A Good Driver Discount shall be afforded on a vehicle if the rated operator of the vehicle qualifies as a Good Driver.

- a. A “Good Driver” is a driver who meets ALL of the requirements specified in 1. through 5. below. A Good Driver is a driver who:
1. has been continuously licensed to drive for the immediately preceding 3 years.
 1. has not been assigned a total of more than one violation point for the convictions and accidents as described in the Conviction and Accident Points Assessment section below, in the 3 years preceding the effective date of the policy.
 2. has not been determined to be principally at-fault as the driver of a motor vehicle involved in an accident that occurred in the three years preceding the effective date of the policy, if such accident resulted in bodily injury with total damages exceeding \$1000 or resulted in the death of any person.

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RULE 4. CLASSIFICATIONS (Cont'd)

4. has not been convicted of a violation of any of the following Vehicle Code or Penal Code sections in the ten years prior to the effective date of the policy:
 - a. Cal. Veh. Code Section 23140, pertaining to violations of driving under the influence of an alcoholic beverage by persons under 21 years of age.
 - b. Cal. Veh. code Section 23152, pertaining to certain violations of driving under the influence of any alcoholic beverage and/or drug.
 - c. Cal. Veh. Code Section 23153, pertaining to certain violations of driving under the influence of any alcoholic beverage and/or drug resulting in bodily injury to any other person.
 - d. Cal Veh. Code Section 23175, pertaining to conviction of Section 23152, within seven years of three or more separate violations of Section 23103 or 23103.5 or Section 23152 or 23153, or any combination thereof.
 - e. Cal Veh. Code 23190, pertaining to (1) conviction of Section 23153 within seven years of two or more separate violations of Section 23103, as specified in 23103.5 or Section 23152 or 23153, or any combination thereof; or (2) conviction of Section 23153 and the act or neglect legally caused great bodily injury.
 - f. Cal. Penal Code section 191.5, pertaining to gross vehicular manslaughter in the driving of a vehicle where the driving was in violation of Section 23140, 23152, or 23153 of the Vehicle Code.
 - g. Cal. Penal Code Section 192, pertaining to vehicular manslaughter involving driving a vehicle: (1) in violation of Section 23140, 23152, or 23153 of the Vehicle Code and in the commission of an unlawful act, not amounting to felony, but without gross negligence; or (2) in violation of Section 23140, 23152 or 23153 of the Vehicle Code and in the commission of a lawful act which might produce death, in an unlawful manner, but without gross negligence.
5. has not had more than one dismissal (pursuant to the Vehicle code) in the 3 years immediately preceding the effective date of the policy of a violation that would have resulted in the imposition of more than one violation point as described under Conviction and Accident Points below. Note: Dismissals that were made confidential may not be considered for the purpose of this rule.

b. Conviction & Accident Points Assessment for Good Driver Discount

1. Convictions
 - a. Determine the number of traffic violation convictions of each rated driver on the policy. Assign the point values established by the CA DMV for the traffic violation convictions specified below.
 - b. Points are assigned for the following convictions regardless of whether the violations occurred while operating a motor vehicle for compensation during the hours of employment.

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RULE 4. CLASSIFICATIONS (Cont'd)

1. Two points are assigned for convictions of:
 - (a) Failure to stop at the scene of an accident.
 - (b) Reckless driving.
 - (c) Section 23152 of the Motor Vehicle Code.
 - (d) Section 23153 of the Motor Vehicle Code.
2. One point is assigned for convictions of the following:
 - (a) Driving a motor vehicle at any time when that person's driving privilege is suspended or revoked.
 - (b) Failure of a driver of a vehicle, other than a common carrier vehicle, to file an accident report with the proper authorities within 24 hours after involvement in an accident involving BI to or death of any person.
 - (c) Homicide or assault arising out of the operation of a motor vehicle.
3. Points are assigned for the following convictions EXCEPT if these violations occurred while operating a motor vehicle for compensation during the hours of employment, provided (1) the insured's specific duties included driving their employer's motor vehicle, and (2) the employee or applicant submits a written declaration made by the employee under penalty of perjury that the applicant or insured was, at the time of the violation, operating a motor vehicle during the hours of his/her employment.
 - (a) Two points are assigned for convictions of:
 - (i) Driving in willful or wanton disregard for safety of persons or property while fleeing or attempting to elude a peace officer.
 - (ii) Death or serious bodily injury legally caused by fleeing or attempting to elude a peace officer.
 - (iii) Driving the wrong way on a divided highway.
 - (iv) Driving on a highway at speeds in excess of 100 miles per hour.
 - (v) Engaging in any motor vehicle speed contest on a highway.
 - (vi) Engaging in, or aiding or abetting in, any motor vehicle exhibition of speed.
 - (vii) Illegal transportation of explosives.
 - (viii) Convictions of Section 23140(a) or Section 23140(b) of the Motor Vehicle Code.

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RULE 4. CLASSIFICATIONS (Cont'd)

- (b) One point is assigned for conviction of any other moving traffic violation for which one violation point is assigned by the CA DMV. This paragraph does not apply to any traffic violation conviction which is specifically described in paragraph 2. or 3.a. above.

2. Accidents

- (a) For each rated driver, determine the number of principally at-fault accidents in the three year period immediately preceding the effective date of the policy.
- (b) A driver is not eligible for the Good Driver Discount if the driver is found to be principally at-fault in an accident which involved bodily injury with total damages in excess of \$1000 or resulted in death.
- (c) One chargeable accident point is assigned if a driver was found to be principally at-fault in an accident which resulted only in damage to property, if the total loss or damage caused by the accident exceeded \$1000.
 - (i) the vehicle was lawfully parked at the time of the accident. A vehicle rolling from a parked position shall not be considered to be lawfully parked, but shall be considered as in the operation of the last operator; or
 - (ii) the vehicle was struck in the rear by another vehicle, and the driver has not been convicted of a moving traffic violation in connection with the accident; or
- (d) A driver shall be considered "principally at-fault" in an accident if: (1) the accident was a solo vehicle accident; or (2) the driver's actions or omissions were at least 51% of the legal cause of the accident, subject to the EXCEPTIONS below.
 - (iii) the driver was not convicted of a moving traffic violation and the operator of another vehicle in the accident was convicted of a moving traffic violation; or
 - (iv) the driver's vehicle was damaged as a result of contact with a vehicle operated by a "hit and run" operator of another vehicle, and the accident was reported to legal authorities within a reasonable time after the accident; or
 - (v) the accident resulted from contact with animals, birds, or falling objects; or
 - (vi) the driver was responding to a call of duty as a paid or volunteer member of any police or fire department, first aid squad, or any law enforcement agency, while performing any other governmental function in a public emergency.

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RULE 4. CLASSIFICATIONS (Cont'd)

- (vii) the accident was a solo vehicle accident that was principally caused by a hazardous condition of which a driver, in the exercise of reasonable care, would not have noticed (for example "black ice") or in the exercise of reasonable care could not have been avoided (for example avoiding a child running into the street).

17. Policy Characteristics

A. Multiple Policy Discount

To be eligible for the discount, the named insured on the auto policy must also be the named insured on a USAA Group insurance policy, to include P&C and Life, which is in-force at the effective date or renewal date of the auto policy.

Refer to the Classification Factor Page for the discount factor. The factor is applied to all class rated vehicles on the policy for Bodily Injury, Uninsured Motorists Bodily Injury, Uninsured Motorists Property Damage, Medical Payments, Property Damage, Comprehensive, Collision, and Waiver of Collision Deductible coverages.

B. Persistency Discount

Eligibility for the Persistency Discount is based on the number of years the named insured has maintained an auto policy continuously in-force with the USAA Group. Members who cancel their USAA Group auto policy due to military deployment and who reinstate coverage upon their return from deployment receive credit for their time with a USAA Group auto policy in-force immediately preceding deployment, but not for time deployed.

Refer to the Classification Factor Page for the discount factor. The factor is applied to all class rated vehicles on the policy for Bodily Injury, Uninsured Motorists Bodily Injury, Uninsured Motorists Property Damage, Medical Payments, Property Damage, Comprehensive, Collision, and Waiver of Collision Deductible coverages.

18. New Vehicle Discount

A discount for Bodily Injury and Property Damage Liability, Medical Payments, Collision and Comprehensive coverages shall be afforded for private passenger autos and trucks that are classified in vehicle age groups 1, 2, or 3.

From January 1 through September 30, vehicle age group 1 is comprised of vehicles having a model year that is greater than or equal to the current calendar year. Vehicle age group 2 would be comprised of vehicles having a model year one year older than the current calendar year. Vehicle age group 3 would be comprised of vehicles having a model year two years older than the current calendar year. The remainder of the vehicles would be classified as vehicle age group 4.

From October 1 through December 31, vehicle age group 1 is comprised of all vehicles having a model year that is greater than the current calendar year. Vehicle age group 2 would be comprised of vehicles having a model year equal to the current calendar year. Vehicle age group 3 would be comprised of vehicles having a model year one year older than the current calendar year. The remainder of the vehicles would be classified as vehicle age group 4.

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RULE 4. CLASSIFICATIONS (Cont'd)

19. Premier Operator Discount

This discount is applicable at a vehicle level when the rated operator qualifies for the Good Driver Discount and has at least five years of driving experience, incurring no At-Fault Accidents and no Major Convictions within the previous five years.

See Premier Operator Discount chart displayed on state rate pages to determine applicable discount factor.

Rules regarding consideration of at-fault accidents follow rule 4.B.2.

20. Storage Discount

The storage discount applies if the insured has added the Storage Endorsement by notifying us that:

- a. the vehicle is in storage in a secure location; and
- b. the insured will not drive the vehicle nor allow the vehicle to be driven by others without first removing the Storage Endorsement.

The discount amount can be found in the rate pages.

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5. DRIVING SAFETY RECORD

A. Eligibility

An auto is eligible for rating under this Plan if it is classified in accordance with Rule 4.a. and b. Motorcycles, antique autos, and electric vehicles are also eligible for rating under this plan. References in this rule to the term "motor vehicle" should be interpreted as referring also to motorcycles and similar vehicles rated in accordance with Rule 19., Miscellaneous Vehicles.

B. Definitions

1. Convictions

- a. Twelve conviction points shall be assigned for convictions such as:
 1. manslaughter, homicide or assault arising out of the operation of a motor vehicle; or
 2. committing any other felony involving the use of a motor vehicle; or
 3. failure to stop and render aid or report when involved in an accident; or
 4. transportation of illegal whiskey or transportation of illegal liquor for sale; or
 5. driving while intoxicated or under the influence of drugs; or
 6. violation of minor blood alcohol content level; or
 7. driving with blood alcohol content level greater than the legal limit; or
 8. driving under the influence of substances not intended to Intoxicate; or
 9. driving under the influence resulting in death or injury; or
 10. driving while intoxicated resulting in death.
- b. Ten conviction points shall be assigned for the conviction such as highway racing or speed contest.
- c. Eight conviction points shall be assigned for convictions such as driving while license is suspended or revoked.
- d. Four conviction points shall be assigned for convictions such as:
 1. driving a motor vehicle in a reckless manner; or
 2. passing a stopped school bus; or
 3. driving while drinking, possession of open container of alcohol or minor in possession of alcohol in a motor vehicle.
- e. Two conviction points shall be assigned for convictions such as careless driving.

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5. DRIVING SAFETY RECORD (Cont'd)

- f. One conviction point shall be assigned for any moving traffic violation conviction not meeting the criteria in the preceding items a. through e EXCEPTIONS:

Convictions for the following shall not be regarded as moving traffic violations and should not be considered for surcharge:

1. inadequate muffler or excess escape of exhaust products; or
2. improper lights or other equipment except brakes; or
3. failure to sign or display registration card; or
4. failure to display license plates; or
5. failure to have in possession driver's license provided there is a valid one in existence; or
6. failure to display current inspection certificate.

2. Accidents:

An accident involving the driver or any resident operator is considered chargeable if the total loss or damage under Bodily Injury, Property Damage and/or Collision coverage is in excess of \$1000, not including any payments made solely due to Auto Features, or resulted in death.

EXCEPTIONS:

- (a) Accidents incurred by an operator demonstrated to be a named insured or a principal operator of an auto insured under a separate policy are not considered chargeable; and

(b) Accidents occurring under the following circumstances are not considered chargeable:

- (i) auto lawfully parked (if the parked vehicle rolls from the parked position then any such accident is charged to the person who parked the auto); or
- (ii) applicant, owner or other household operator involved in an accident is determined to be less than 51% of the legal cause of the accident; or
- (iii) auto is struck in the rear and the applicant or other resident operator has not been convicted of a moving traffic violation; or
- (iv) operator of the other auto convicted of a moving traffic violation and the applicant or other resident operator was not convicted; or
- (v) auto struck by a "hit-and-run" vehicle and accident reported to the proper authority within 24 hours; or
- (vi) damage by animals, falling objects; or
- (vii) using motor vehicle in response to an emergency as a paid or volunteer member of any fire department or law enforcement agency. This exception is not valid except during emergency.
- (viii) the accident was a solo vehicle accident that was principally caused by a hazardous condition of which a driver, in the exercise of reasonable care, would not have noticed (for example "black ice") or avoiding a child running into the street.

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5. DRIVING SAFETY RECORD (Cont'd)

C. Refund of Premium Increase

If the premium has been increased due to a chargeable accident, and it is later determined that the accident falls under one of the exceptions in this rule, the company shall refund to the insured the increased portion of the premium generated by the accident.

D. Experience Period

a. Convictions

For convictions, the experience period shall be the three years immediately preceding the effective date of the new or renewal policy.

b. Accidents

(1) New Business and Newly Added Operators.

For chargeable accidents, the experience period will be the three years immediately preceding the effective date of the new or renewal policy.

(2) Renewal.

For chargeable accidents, the experience period will include accidents with chargeability start dates within the three years prior to the renewal effective date. The chargeability start date is the effective date of the first renewal policy prepared after payment was made for an accident.

E. Administration of Driving Safety Record

Information necessary to assign proper surcharge shall be determined by any one or combination of the following:

- a. Company's own records; or
- b. Motor Vehicle records; or
- c. Information provided by the insured.

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6. MODEL YEAR

- A. The model year of the auto is the year assigned by the auto manufacturer. Base rates are displayed in the state rate pages. Rates not shown shall be determined using the applicable relativity displayed in the state pages. To determine rates for other symbols and model years, multiply the applicable relativity by the base rate for the applicable model year.
- B. Rebuilt or structurally altered autos--the model year of the chassis determines the model year of the auto.

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7. RESERVED FOR FUTURE USE

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8. POLICY PERIOD

Premium charged for policy terms is as follows:

- A. Twelve month policies - charge annual premium.
- B. Six month policies - charge 50% of the annual premium.
- C. Other term policies shall be written in accordance with the pro rata table in the cancellation rule.

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9. CHANGES

All changes requiring premium adjustments shall be computed pro rata.

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10. CANCELLATION

- A. If a policy, vehicle or form of coverage is cancelled either by the company or by the insured, compute return premium pro rata.
- B. Instructions for use of the pro rata tables
 - 1. Express the date of cancellation by year and decimal part of a year by combining the calendar year with the decimal appearing opposite the month and day in the pro rata table, e.g. March 7, 1990 is designated as 1990.181.
 - 2. In like manner, express the effective date of the policy by year and decimal part of a year and subtract from the cancellation date.
 - 3. The difference in the case of 1 year policies represents the percentage of the annual premium which is to be retained by the company. For 6 month terms multiply the difference by 2.

NOTE: It is not customary to charge for February 29th.

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Pro Rata Table

January			February			March			April			May			June		
Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio
1	1	0.003	1	32	0.088	1	60	0.164	1	91	0.249	1	121	0.332	1	152	0.416
2	2	0.005	2	33	0.9	2	61	0.167	2	92	0.252	2	122	0.334	2	153	0.419
3	3	0.008	3	34	0.093	3	62	0.17	3	93	0.255	3	123	0.337	3	154	0.422
4	4	0.011	4	35	0.096	4	63	0.173	4	94	0.258	4	124	0.34	4	155	0.425
5	5	0.014	5	36	0.099	5	64	0.175	5	95	0.26	5	125	0.342	5	156	0.427
6	6	0.016	6	37	0.101	6	65	0.178	6	96	0.263	6	126	0.345	6	157	0.43
7	7	0.019	7	38	0.104	7	66	0.181	7	97	0.266	7	127	0.348	7	158	0.433
8	8	0.022	8	39	0.107	8	67	0.184	8	98	0.268	8	128	0.351	8	159	0.436
9	9	0.025	9	40	0.11	9	68	0.186	9	99	0.271	9	129	0.353	9	160	0.438
10	10	0.027	10	41	0.112	10	69	0.189	10	100	0.274	10	130	0.356	10	161	0.441
11	11	0.03	11	42	0.115	11	70	0.192	11	101	0.277	11	131	0.359	11	162	0.444
12	12	0.033	12	43	0.118	12	71	0.195	12	102	0.279	12	132	0.362	12	163	0.447
13	13	0.036	13	44	0.121	13	72	0.197	13	103	0.282	13	133	0.364	13	164	0.449
14	14	0.038	14	45	0.123	14	73	0.2	14	104	0.285	14	134	0.367	14	165	0.452
15	15	0.041	15	46	0.126	15	74	0.203	15	105	0.288	15	135	0.37	15	166	0.455
16	16	0.044	16	47	0.129	16	75	0.205	16	106	0.29	16	136	0.373	16	167	0.458
17	17	0.047	17	48	0.132	17	76	0.208	17	107	0.293	17	137	0.375	17	168	0.46
18	18	0.049	18	49	0.134	18	77	0.211	18	108	0.296	18	138	0.378	18	169	0.463
19	19	0.052	19	50	0.137	19	78	0.214	19	109	0.299	19	139	0.381	19	170	0.466
20	20	0.055	20	51	0.14	20	79	0.216	20	110	0.301	20	140	0.384	20	171	0.468
21	21	0.058	21	52	0.142	21	80	0.219	21	111	0.304	21	141	0.386	21	172	0.471
22	22	0.06	22	53	0.145	22	81	0.222	22	112	0.307	22	142	0.389	22	173	0.474
23	23	0.063	23	54	0.148	23	82	0.225	23	113	0.31	23	143	0.392	23	174	0.477
24	24	0.066	24	55	0.151	24	83	0.227	24	114	0.312	24	144	0.395	24	175	0.479
25	25	0.068	25	56	0.153	25	84	0.23	25	115	0.315	25	145	0.397	25	176	0.482
26	26	0.071	26	57	0.156	26	85	0.233	26	116	0.318	26	146	0.4	26	177	0.485
27	27	0.074	27	58	0.159	27	86	0.236	27	117	0.321	27	147	0.403	27	178	0.488
28	28	0.077	28	59	0.162	28	87	0.238	28	118	0.323	28	148	0.405	28	179	0.49
29	29	0.079				29	88	0.241	29	119	0.326	29	149	0.408	29	180	0.493
30	30	0.082				30	89	0.244	30	120	0.329	30	150	0.411	30	181	0.496
31	31	0.085				31	90	0.247				31	151	0.414			

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Pro Rata Table

July			August			September			October			November			December		
Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio	Day of Month	Day Of Year	Ratio
1	182	0.499	1	213	0.584	1	244	0.668	1	274	0.751	1	305	0.836	1	335	0.918
2	183	0.501	2	214	0.586	2	245	0.671	2	275	0.753	2	306	0.838	2	336	0.921
3	184	0.504	3	215	0.589	3	246	0.674	3	276	0.756	3	307	0.841	3	337	0.923
4	185	0.507	4	216	0.592	4	247	0.677	4	277	0.759	4	308	0.844	4	338	0.926
5	186	0.51	5	217	0.595	5	248	0.679	5	278	0.762	5	309	0.847	5	339	0.929
6	187	0.512	6	218	0.597	6	249	0.682	6	279	0.764	6	310	0.849	6	340	0.932
7	188	0.515	7	219	0.6	7	250	0.685	7	280	0.767	7	311	0.852	7	341	0.934
8	189	0.518	8	220	0.603	8	251	0.688	8	281	0.77	8	312	0.855	8	342	0.937
9	190	0.521	9	221	0.605	9	252	0.69	9	282	0.773	9	313	0.858	9	343	0.94
10	191	0.523	10	222	0.608	10	253	0.693	10	283	0.775	10	314	0.86	10	344	0.942
11	192	0.526	11	223	0.611	11	254	0.696	11	284	0.778	11	315	0.863	11	345	0.945
12	193	0.529	12	224	0.614	12	255	0.699	12	285	0.781	12	316	0.866	12	346	0.948
13	194	0.532	13	225	0.616	13	256	0.701	13	286	0.784	13	317	0.868	13	347	0.951
14	195	0.534	14	226	0.619	14	257	0.704	14	287	0.786	14	318	0.871	14	348	0.953
15	196	0.537	15	227	0.622	15	258	0.707	15	288	0.789	15	319	0.874	15	349	0.956
16	197	0.54	16	228	0.625	16	259	0.71	16	289	0.792	16	320	0.877	16	350	0.959
17	198	0.542	17	229	0.627	17	260	0.712	17	290	0.795	17	321	0.879	17	351	0.962
18	199	0.545	18	230	0.63	18	261	0.715	18	291	0.797	18	322	0.882	18	352	0.964
19	200	0.548	19	231	0.633	19	262	0.718	19	292	0.8	19	323	0.885	19	353	0.967
20	201	0.551	20	232	0.636	20	263	0.721	20	293	0.803	20	324	0.888	20	354	0.97
21	202	0.553	21	233	0.638	21	264	0.723	21	294	0.805	21	325	0.89	21	355	0.973
22	203	0.556	22	234	0.641	22	265	0.726	22	295	0.808	22	326	0.893	22	356	0.975
23	204	0.559	23	235	0.644	23	266	0.729	23	296	0.811	23	327	0.896	23	357	0.978
24	205	0.562	24	236	0.647	24	267	0.732	24	297	0.814	24	328	0.899	24	358	0.981
25	206	0.564	25	237	0.649	25	268	0.734	25	298	0.816	25	329	0.901	25	359	0.984
26	207	0.567	26	238	0.652	26	269	0.737	26	299	0.819	26	330	0.904	26	360	0.986
27	208	0.57	27	239	0.655	27	270	0.74	27	300	0.822	27	331	0.907	27	361	0.989
28	209	0.573	28	240	0.658	28	271	0.742	28	301	0.825	28	332	0.91	28	362	0.992
29	210	0.575	29	241	0.66	29	272	0.745	29	302	0.827	29	333	0.912	29	363	0.995
30	211	0.578	30	242	0.663	30	273	0.748	30	303	0.83	30	334	0.915	30	364	0.997
31	212	0.581	10	243	0.666				31	304	0.833				31	365	1

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11. EXACT PREMIUM

The premium shall be rounded to the nearest whole cent, separately for each coverage. This procedure shall apply to all interim premium adjustments.

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12. RESERVED FOR FUTURE USE

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13. RESERVED FOR FUTURE USE

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14. MISCELLANEOUS COVERAGES

A. Uninsured motorists coverage

1. Owners (Class Code, Refer to Statistical Plan)

BODILY INJURY

(Uninsured Motorists Bodily Injury includes Underinsured Motorists Bodily Injury coverage)

This form of auto insurance shall be written at limits equal to the Bodily Injury Liability limits, under every auto liability policy issued or delivered to the owner of a motor vehicle principally used or principally garaged in California.

If this form of insurance is purchased it must apply to all vehicles on the policy.

Exceptions:

1. The named insured may, by agreement in writing, reject such coverage entirely, reject such coverage when an insured motor vehicle is operated by a person designated by name, or select lower limits, but may not select limits less than the Financial Responsibility limits.

Note: the written agreement to reject this coverage is binding with respect to:

- a. any continuation or renewal of the policy.
 - b. any other policy which extends, changes, supersedes or replaces the policy, when issued by the same insurer.
 - c. reinstatement of the policy within 30 days of any lapse.
2. Uninsured Motorist Bodily Injury limits in excess of \$30,000/60,000 split limit are NOT required to be offered.

PROPERTY DAMAGE

Uninsured Motorists Property Damage coverage shall be offered under every auto liability policy issued or delivered to the owner of a motor vehicle principally used or principally garaged in the State of California to which:

- a. Uninsured Motorists Bodily Injury coverage is afforded; and
- b. Collision coverage is not afforded.

The offer must be made in writing in accordance with the procedures in the California Insurance Law.

The named insured may elect not to carry this coverage or may reject such coverage when an insured motor vehicle is operated by a person designated by name. The agreement to reject this coverage is binding with respect to:

- a. any continuation or renewal of the policy.

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14. MISCELLANEOUS COVERAGES (Cont'd)

- b. any other policy which extends, changes, supersedes or replaces the policy when issued by the same insurer
- c. reinstatement of the policy within 30 days of any lapse.

Rates for \$3,500 Uninsured Motorist Property Damage coverage are shown on the California Rate pages. No other limit is available.

WAIVER OF COLLISION DEDUCTIBLE

This coverage shall be offered under every auto liability policy issued or delivered to the owner of a motor vehicle or trailer principally used or principally garaged in California to which Uninsured Motorist Bodily Injury coverage and Collision coverage are afforded.

The named insured may elect not to carry this coverage or may reject such coverage when an insured motor vehicle is operated by a person designated by name.

The agreement to reject this coverage is binding with respect to:

- a. any continuation or renewal of the policy.
 - b. any other policy which extends, changes, supersedes or replaces the policy when issued by the same insurer.
 - c. reinstatement of the policy within 30 days of any lapse.
- B. Deductible insurance - for collision and comprehensive deductibles for which no premium is shown, refer to state rate pages.
- C. Rental reimbursement/transportation expenses - this coverage may be written only when comprehensive coverage is afforded. The available options are:
- 1. Economy Class, which means "mini", small or compact 2- and 4 door cars, including convertibles, that are not considered sports or luxury vehicles and are not the station wagon type.
 - 2. Standard Class, which means standard and full size 2- and 4-door cars, including convertibles, that are not considered sports or luxury vehicles and are not the station wagon type.
 - 3. Multipassenger/Truck Class, which means:
 - a. Sports and luxury cars of any size;
 - b. Station wagons;
 - c. Minivans;
 - d. Mid-size cargo and passenger vans;
 - e. Pickup trucks; and
 - f. "Mini", small and midsize sport utility vehicles (SUVs) that are not considered luxury SUVs.

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14. MISCELLANEOUS COVERAGES (Cont'd)

4. Large SUV Class, which means luxury SUVs of any size, large SUVs and large cargo or passenger vans, private passenger vehicles equipped to assist the disabled.

D. Towing and Labor Costs

1. Towing and Labor Costs Coverage may be written on policies insuring (a) private passenger type autos, or (b) a trailer designed for use with a private passenger auto, or (c) a motor home.
2. The Company's liability is any reasonable amount for each disablement.
3. Rate - Refer to state rate sheets.

E. Ride Share Gap Protection

1. Ride Share Gap Protection is available for private passenger vehicles that are used to provide prearranged transportation of persons or property in conjunction with a Transportation Network Company.
2. Ride Share Gap Protection is not available for non-owned vehicles.
3. Ride Share Gap Protection extends coverage during the time when the driver is available to accept a passenger or delivery assignment, but has not yet accepted a passenger or delivery assignment.
4. Refer to Rate Pages for premium.

F. Auto Features

1. Car Replacement Assistance.
 - a. Car Replacement Assistance is available for private passenger cars, trucks, sports utility vehicles (SUVs) and vans that are insured for both Comprehensive coverage and Collision coverage.
 - b. Replacement Assistance is not applicable to non-owned vehicles.
 - c. The Car Replacement Assistance benefit will be 20% of the actual cash value of the insured vehicle on the date of total loss.
 - d. Refer to Rate Pages for premium.

15. CERTIFIED RISKS - FINANCIAL RESPONSIBILITY LAWS

For certified risks, an administrative fee of \$50 shall be added to the total annual liability premium.

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16. NAMED NON-OWNER POLICY

Liability and Medical Payments coverages - charge 50% of the premium that would apply if such individual owned an auto. Apply a factor of 1.00 for the Multi-Car Factor.

Uninsured Motorists Coverage - charge the "first auto" Uninsured Motorists rate applicable to owners. Apply a factor of 1.00 for the Multi-Car Factor.

Attach applicable endorsement

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17. EXTENDED NON-OWNED LIABILITY COVERAGE

- A. Liability coverage may be extended to the named insured and resident relatives when an auto is furnished for regular use if:
1. The named insured or resident relative is not employed or otherwise engaged in an auto business; and
 2. There is no other primary liability insurance in effect for the furnished auto.

The premium charge will be 50% of the liability premium which would apply if the furnished auto were being insured as an owned auto.

- B. Medical Payments available only if bodily injury and property damage coverages are extended. For rates, refer to state rate pages.
- C. Attach applicable endorsement.

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18. INCREASED LIMITS

- A. Bodily Injury liability increased limits table - refer to state rate pages to determine the increased limits factor to be applied to the basic limits rate.
- B. Property Damage liability increased limits table - Shown on the state rate pages.
- C. Medical Payments increased limits - shown on the state rate pages.
- D. Uninsured Motorists increased limits - shown on the state rate pages.

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19. MISCELLANEOUS TYPES

A. Motor homes (Class Code 943700)

1. A motor home is a vehicle equipped with a living area as an integral part of the chassis.
2. Motor homes used in business are to be classified and rated as private passenger autos. Motor homes not so used - Rates are shown on the state rate pages.

B. Trailers designed for use with private passenger autos

1. Recreational Trailers (Class Code 944200) are equipped with living area. Insured must maintain a separate and permanent residence. All other trailers (Class Code 941000) form a separate category.

Trailers must be insured as separate items for physical damage with separate premiums shown for each unit. Rates are shown on the state rate pages.

- a. "New" means purchased new not more than 18 months prior to date insurance attaches.
"Old"--All Others. Use 80% of New Rate.
 - b. For Recreational Trailers having a cost exceeding \$10,000, rates for each additional \$1,000 are shown on the state rate pages.

2. All Other Trailers

Rates are shown on the state rate pages.

For trailers having a cost exceeding \$10,000, rates per each additional \$1,000 are shown on the state rate pages.

C. Motorcycles and mopeds - not used in a business.

1. For bodily injury and property damage liability, medical payment, and Uninsured Motorists coverages, apply the appropriate factor from the state rate pages to the private passenger base rates.
2. For Comprehensive and Collision coverages.
 - a. On 1990 and subsequent Model Year Vehicles - Charge the applicable percentage of the Symbol 2 Rate for the model year of the vehicle as shown on the state rate pages.
 - b. 1989 and Prior Model Year Vehicles - Charge the applicable percentage of the Symbol 7 Rate for the model year of the vehicle as shown on the state rate pages.

D. Snowmobiles and all-terrain vehicles.

1. Snowmobile does not include a vehicle using propellers or fans for locomotion.

Snowmobiles (class code 959000)

- a. For Bodily Injury and Property Damage Liability, Medical Payments, and Uninsured/Underinsured Motorists coverages, charge the applicable percentage of private passenger base rates as shown on the state rate pages.

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19. MISCELLANEOUS TYPES (Cont'd)

b. For Comprehensive and Collision coverages, charge the rate shown on the state rate pages.

2. All-terrain vehicles

- a. All-terrain vehicles insured prior to August 5, 2009 shall be classified and rated as private passenger vehicles.
- b. All-terrain vehicles newly insured effective on or after August 5, 2009, including any all-terrain vehicle previously insured and re-added effective on or after August 5, 2009 shall be classified and rated as snowmobiles.

All-terrain vehicles (class code 959000)

E. Dune buggies - classify and rate as private passenger auto.

F. Golfcart (class code 943500)

A golf cart is a three or four wheel motor vehicle with limited speed capabilities designed to carry golfers and their equipment around a golf course.

1, For Bodily Injury and Property Damage Liability, Medical Payments, and Uninsured/Underinsured Motorists coverages, charge the applicable percentage of private passenger base rates as shown on the state rate pages.

An Expense Fee as shown on the state rate pages is to be added separately to the rates for Bodily Injury and Property Damage Liability coverages. No deviation or company relativity applies to the Expense Fee.

2. For Comprehensive and Collision coverages, charge the rate shown on the state rate pages.

G. Antique autos (class code 9620) - must be 25 or more years old and maintained primarily for use in exhibitions and club activities.

For Bodily Injury and Property Damage Liability, Medical Payments, and Uninsured/Underinsured Motorists coverages, charge the applicable percentage of private passenger base rates as shown on the state rate pages.

H. Neighborhood Electric Vehicles (NEV)/Low Speed Vehicles (LSV)

1. For Bodily Injury and Property Damage Liability, Medical Payments, and Uninsured/Underinsured Motorists coverages, charge the applicable percentage of private passenger base rates as shown on the state rate pages
2. For Comprehensive and Collision coverages, charge the rate shown on the state rate pages.

19. MISCELLANEOUS TYPES (Cont'd)

I. Kit Cars and Replicas

A Kit Car is a motor vehicle of the private passenger type which is constructed from a kit and installed on a vehicle chassis.

A replica is a motor vehicle of the private passenger type, the make and model of which is a reproduction of an antique or classic auto, which is maintained and customarily used for personal or business purposes.

1. For Bodily Injury and Property Damage Liability, Medical Payments, and Uninsured/Underinsured Motorists coverages, classify and rate as a private passenger auto.
2. A replica or kit car shall be insured on an actual cash value basis. The rating symbol for these autos shall be determined by applying the current/appraised value to the appropriate price range in the (0) column of the chart in the Symbol and Identification Section in this manual and using the resulting rating symbol increased by one. The latest model year will apply on a permanent basis. After the Symbol has been determined, rate as a private passenger auto.

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20. EXTENDED BENEFITS COVERAGE

Death Benefit, Wage Earner Disability Benefit and Essential Services Disability Benefit are available to the Personal Auto Policy which affords Bodily Injury Liability Insurance and Medical Payments Coverage.

Death Benefit - \$5,000 per person insured.

Wage Earner Disability Benefit - Choice of 3 limits available for the named insured and family members.

The following apply per person insured:

Monthly Limit
\$ 500
\$1,000
\$2,000

Payment for a covered person, other than the named insured or family member, will not exceed \$1,000 per month.

Essential Services Disability Benefit - Per person insured:

Weekly Limit
\$ 45

The annual premium per auto shall be determined on the basis of the monthly Wage Earner Disability Benefit limit chosen.

Rates: Refer to state rate pages.

Extended Benefits Premiums will be modified by the Good Driver Discount, Vehicle Injury Rating Plan, and Passive Restraint Discount.

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11 UNITED STATES DISTRICT COURT
 12 SOUTHERN DISTRICT OF CALIFORNIA

14 EILEEN-GAYLE COLEMAN, and
 15 ROBERT CASTRO, on behalf of
 16 themselves and all others similarly
 17 situated,

18 Plaintiffs,

19 v.

20 UNITED SERVICES AUTOMOBILE
 21 ASSOCIATION and USAA GENERAL
 22 INDEMNITY COMPANY,

23 Defendants.

CASE NO. 3:21-cv-00217-RSH-KSC

**DECLARATION OF KEITH
 WECHSLER**

Judge: Hon. Robert S. Huie
 Action Filed: February 4, 2021

PER CHAMBERS RULES, NO ORAL
 ARGUMENT UNLESS SEPARATELY
 ORDERED BY THE COURT

DECLARATION OF KEITH WECHSLER

I, Keith Wechsler, declare as follows:

1. I am an Executive Director of Property & Casualty Product Management at United Services Automobile Association (“USAA”). I offer this declaration in support of Defendants’ opposition to Plaintiffs’ motion for class certification and Defendants’ motion to exclude the opinions and testimony of Plaintiffs’ expert witnesses.

2. Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently to these facts.

A. My role and history at USAA.

3. In 2008, I attained my Bachelor of Science degree from Bentley University, majoring in corporate finance and accounting. Ever since then I have worked in the insurance industry.

4. I started at USAA in July 2018. From July 2018 to October 2021, I was a Director of Product Management. In that role, I led the team responsible for USAA’s auto insurance business in California.

5. In October 2021, I started in my current role as an Executive Director of Property & Casualty Product Management. In that role I lead the team responsible for USAA’s auto insurance business in California, Texas, and the Central Plains states.

6. Generally speaking, since approximately July 2018, I have had overall responsibility for USAA’s auto insurance business in California—including, among many other things, the rates and relativities of Defendants “United Services”¹ and USAA General Indemnity Company (“GIC”) in California, and the resulting premiums charged to policyholders in each company. In that role, I have become extensively familiar with the processes and requirements involved in setting rates and relativities

¹ I use “USAA” to refer to the parent company. I use “United Services” to refer specifically to the entity that provides auto insurance in California.

1 for United Services and GIC in California, as well as for making any changes to those
2 rates.

3 7. I am also very familiar with USAA’s corporate structure and its
4 longstanding practice, throughout the United States, of insuring different segments of
5 the military through different insurance entities.

6 8. In addition, based on my experience and responsibilities at USAA, I am
7 familiar with the significant role played by the California Department of Insurance
8 (“CDI”) in setting rates and relativities, as well as evaluating and approving any
9 changes to them. Since I joined USAA four years ago, I and my team have interacted
10 with the CDI extensively in the context of rate applications, among other things.
11 Because of this experience, I am very familiar with the CDI’s practices and
12 requirements with respect to the rate setting and approval process—and this includes
13 the requirements of Proposition 103, the California law that requires the CDI’s “prior
14 approval” before an insurance company can implement any changes to its auto
15 insurance rates (or other property and casualty rates).

16 **B. Overview of United Services and GIC, and the CDI’s awareness and**
17 **approval of the different rates charged by each of them.**

18 9. This is USAA’s centennial anniversary year. USAA started in 1922,
19 formed by 25 Army officers who could not obtain auto insurance and decided to insure
20 each other. One hundred years later, USAA now provides auto insurance through four
21 different companies, each of which serves a different segment of the military or
22 military family members: United Services, GIC, USAA Casualty Insurance Company
23 (“CIC”), and Garrison Property and Casualty Insurance Company (“Garrison” or
24 “GAR”).

25 10. United Services has been insuring Californians since approximately 1948.
26 GIC began insuring Californians in approximately 1998.

27 11. USAA’s use of affiliates has allowed it to expand and tailor its offerings
28 over the years; it generally is now open to all members of the military serving or who

1 honorably have served, and their families. In California, members of the public with
2 no personal or family military affiliation are generally not eligible for USAA’s
3 property and casualty insurance. In other words, those with no military affiliation
4 generally may not obtain auto insurance coverage from any of the four USAA insurers.

5 12. Attached as Exhibit A is USAA’s California Auto Company of Placement
6 Rules Effective as of March 22, 2022 (“Placement Rules”). The Placement Rules
7 detail the criteria that USAA uses to place policyholders with the appropriate USAA
8 insurance company. Individuals who purchase insurance through USAA are placed in
9 the company for which they are eligible based on the Placement Rules in effect on the
10 date of their policy issuance. As discussed further below, since approximately 2015,
11 the CDI has required USAA to file its Placement Rules as part of their public rate
12 filings.

13 13. I understand that Plaintiffs contend United Services insures current and
14 former officers, and that GIC insures current and former enlisted personnel. In reality,
15 it is not that simple: United Services also insures many enlisted people, and GIC
16 insures many officers. It would be more accurate to say that United Services generally
17 insures *higher-ranking* officers and enlisted personnel (E-7 and above), and that GIC
18 generally insures *lower-ranking* officers and enlisted personnel (E-1 through E-6).

19 14. Under the Placement Rules, USAA offers United Services auto insurance
20 to individuals who meet the following criteria:

- 21 • Commissioned and warrant officers in the U.S. Armed Forces (Army, Air
22 Force, Navy, Marine Corps, Space Force and Coast Guard):
 - 23 ○ on active duty, or in the Selected Reserve or National Guard; or
 - 24 ○ retired from active duty, Selected Reserve or National Guard; or
 - 25 ○ separated with a discharge type of “Honorable” or “General – Under
26 Honorable Conditions” from active duty, Selected Reserve, or
27 National Guard.

28

- 1 • Senior non-commissioned/petty officers, defined as E-7 or above in the U.S.
- 2 Armed Forces:
- 3 ○ on active duty, or in the Selected Reserve or National Guard; or
- 4 ○ retired from active duty, Selected Reserve or National Guard; or
- 5 ○ separated with a discharge type of “Honorable” or “General – Under
- 6 Honorable Conditions” from active duty, Selected Reserve, or
- 7 National Guard.
- 8 • Commissioned officers actively serving in the United States Public Health
- 9 Service or the National Oceanic and Atmospheric Administration.
- 10 • Cadets, midshipmen, and officer or warrant officer candidates in a
- 11 government-sponsored program leading to a commission.
- 12 • Un-remarried widow(er)s of members who are eligible to purchase a USAA
- 13 policy. Does not include widow(er)s of widow(er)s.
- 14 • Regular employees and retired employees of USAA and its subsidiaries with
- 15 five or more years of service who held an in-force USAA auto policy as of
- 16 September 16, 2015. Employees or retirees that meet this criteri[on] will no
- 17 longer be eligible if they cancel or non-renew their exiting policy.

18 15. Under the Placement Rules, USAA offers GIC auto insurance to
 19 individuals who meet the following criteria:

- 20 • Enlisted and junior non-commissioned officers, defined as E-1 through E-6
- 21 in the U.S. Armed Forces:
- 22 ○ on active duty, or in the Selected Reserve or National Guard; or
- 23 ○ retired from active duty, Selected Reserve or National Guard; or
- 24 ○ separated with a discharge type of “Honorable” or “General – Under
- 25 Honorable Conditions” from active duty, Selected Reserve, or
- 26 National Guard.
- 27 • Un-remarried widow(er)s of members who are eligible to purchase a GIC
- 28 policy. Does not include widow(er)s of widow(er)s.

1 16. Based on my role, responsibilities, and experience at USAA, I am certain
2 that the CDI is well aware of USAA’s Placement Rules and its longstanding practice
3 of insuring different segments of the military through different subsidiary insurers. I
4 am also certain that the CDI is well aware that each of the four USAA companies
5 charges different rates—as they must, since an insurance company’s rates are based on
6 (among other things) the expected risks and loss costs of its particular insureds, and
7 each of the USAA companies serves a different segment of military-affiliated insureds
8 with different risk profiles. I am equally certain that the CDI could not evaluate
9 USAA companies’ rates without an understanding and awareness of USAA’s
10 Placement Rules. Indeed, the CDI has regulated and approved USAA’s rate filings in
11 explicit reliance on USAA’s segmentation of different segments of the military into
12 different companies with different rates.

13 17. For example, between 2010 and 2014, the CDI conducted a market
14 conduct examination of Garrison, one of the USAA subsidiaries. As described on the
15 CDI’s website, the CDI conducts market conduct examinations of licensed insurance
16 companies to evaluate their “compliance with the California Insurance Code (CIC) and
17 the California Code of Regulations (CCR) with respect to rating, underwriting, and
18 claim practices.” (CDI’s website, [http://www.insurance.ca.gov/01-consumers/120-
20 company/09-mcexam/](http://www.insurance.ca.gov/01-consumers/120-
19 company/09-mcexam/) (last visited May 17, 2022).)

21 18. As part of that market conduct examination, the CDI specifically
22 recognized that each of the four USAA companies in California sells identical good
23 driver (and non-good driver) policies to different segments of the military; that each of
24 them charge different base rates and premiums for these policies; and that USAA’s
25 Placement Rules determine from which insurer an individual may purchase a policy.
26 The CDI acknowledged that all of this was consistent with the Insurance Code and
27 applicable regulations.

28 19. Attached as Exhibit B is the CDI’s Market Conduct Examination Report
adopted on March 20, 2014. In its report, the CDI acknowledged the following:

- 1 • the USAA group includes four companies, including United Services and
- 2 GIC;
- 3 • “[a]ll four companies . . . offer the same coverage options under identical
- 4 coverage forms”;
- 5 • United Services “had a lower base rate and [GIC] had a higher base rate”;
- 6 • “[p]er the filed and approved rating plans for the four companies, eligibility
- 7 for each company is based on group membership as follows: [United
- 8 Services] insures active military officers and noncommissioned officers
- 9 while USAA-GIC insures active military enlisted personnel. . . .”
- 10

11 (Ex. B, p. 43.)

12
13 20. The CDI’s 2014 Market Conduct Examination Report went on to explain
14 that all of this was appropriate because, “[u]nder the provisions of CIC § 11628(f),
15 insurers are authorized to limit the issuance and renewal of insurance to persons who
16 are or were engaged in military or governmental service, their spouses, dependents,
17 direct descendants, and former dependents or spouses.” (Ex. B, p. 43.)

18 21. Nonetheless, in the 2014 Market Conduct Examination Report, the CDI
19 expressed concern that USAA’s Placement Rules were not being consistently applied
20 or were being changed without updating the CDI, and/or that USAA was not
21 reevaluating an insured’s group membership at each renewal. (Ex. B, p. 43.)
22 Accordingly, the CDI instructed USAA to file updated Placement Rules as changes
23 were made, and to ensure that policyholders were being reevaluated at each renewal
24 period for the appropriate group membership so that they would pay the lowest
25 premium for which they qualified. (*Id.* at pp. 43-44; see also Exhibit C (which is a true
26 and correct copy of a letter that the CDI sent to USAA’s outside counsel on December
27 10, 2014), p. 47.) USAA has done so ever since.

28

1 **C. Overview of USAA’s, United Services’ and GIC’s California Rate**
2 **Application Process.**

3 22. Generally speaking, under Proposition 103, auto insurance companies in
4 California—including the USAA companies—can charge only those rates that have
5 received prior approval from the CDI. In other words, none of the four USAA
6 companies is allowed to charge auto insurance rates unless the CDI has evaluated and
7 approved those rates, and likewise the USAA companies cannot change rates in any
8 way without CDI’s prior approval. In fact, the Insurance Code (section 1858.07)
9 provides for a civil penalty if an insurer such as GIC uses any rates *other than* the ones
10 the CDI approved for that specific insurer.

11 23. As explained above, since 2018, I have been extensively involved in
12 USAA’s processes for monitoring, evaluating, and if necessary, seeking to change the
13 auto insurance rates for each of the four USAA companies. Ultimately, I and my team
14 have overall responsibility for deciding whether to apply to the CDI for a rate change
15 for any of the USAA companies, and if so what the specific proposed rate change
16 would be.

17 24. USAA constantly monitors and evaluates the performance of its auto
18 insurance products—including whether the rates then in effect are excessive,
19 inadequate, or unfairly discriminatory. As part of that effort, USAA monitors and
20 evaluates the following metrics, among others: loss cost metrics (e.g. frequency,
21 severity, average earned premium, loss ratio), expense metrics (e.g. underwriting
22 expense ratio, loss adjustment expense ratio), and competitiveness metrics (e.g.
23 conversion rate, retention rate, average quoted premium).

24 25. Also, in making the determination whether to apply to CDI for a rate
25 change for any of the USAA companies, I and my team rely on the input of various
26 departments at USAA with different expertise. These departments include but are not
27 limited to: Pricing, Actuarial & Analytics, Underwriting, Claims, and Compliance.
28

1 26. If USAA ultimately determines that a rate change is appropriate for any
2 (or all) of the USAA auto insurance companies in California, the CDI has mandatory
3 data-driven formulas that USAA must utilize. These formulas will result in a set of
4 “indications” that will dictate, by specific insurance coverage (e.g., property damage,
5 collision, uninsured motorist), the range of permissible rate changes (positive or
6 negative), by percentage, to the insurer’s existing rates for each coverage. USAA has
7 *no discretion* to apply for a rate change that is outside of CDI’s range of indications.

8 27. In my experience, the CDI application and approval process for proposed
9 rate changes can be lengthy and time consuming. The CDI plays a very active role in
10 reviewing and commenting on proposed rates of insurers. And in almost all instances,
11 even if an insurance company applies for a rate change that’s within CDI’s indicated
12 range, CDI may still require further changes before approval. So the rate that the
13 insurer applies for is not necessarily the rate the CDI approves. For example, for
14 USAA’s most recent rate change, effective July 25th, 2022, the approval process with
15 the CDI lasted almost 2 years. We submitted our filings on May 28, 2020, and after 18
16 rounds of objections from CDI, requiring numerous revisions to rates and factors by
17 the company, approval was finally received on April 18, 2022. Some of the objections
18 from the CDI required USAA to re-run the sequential analysis process required by
19 Proposition 103 and resulted in changes to our proposed rates across all four
20 companies.

21 28. CDI also can direct companies to submit a filing to adjust rates even if the
22 company doesn’t initiate those changes. They have been known to do so if a company
23 has not filed for a revision in an extended period. Similarly, they can require a
24 company to adjust their proposed changes from an overall increase to an overall
25 decrease during the filing review process if they believe the company proposals are
26 unsupported or the filed rate is excessive. There are several instances over the past 5
27 years across both Auto and Property lines of business where large insurance companies
28

1 have filed for a rate increase and through the CDI review process ultimately
2 implemented a rate decrease.

3 29. There have also been circumstances where USAA or other insurers
4 desired to *lower* their rates, but the CDI precluded them from doing so. For example,
5 in 2020, because of the severe disruption of the COVID-19 pandemic, the CDI
6 precluded any rate changes, either increases or decreases, to any auto insurance
7 coverage (the only changes allowed during this period had to be “rate neutral at the
8 coverage level,” meaning the overall rate impact for each coverage had to be 0.0%).
9 This moratorium on any rate changes, positive or negative, lasted from approximately
10 the third quarter of 2020 to the present. As of May 2022, we still have not seen any
11 private passenger auto rate changes approved by CDI that include rate adjustments
12 other than rate neutral.

13 **D. The ways in which USAA might try to charge the same auto insurance rates**
14 **to all officers and enlisted personnel in California, in response to this**
15 **lawsuit.**

16 30. I am generally familiar with Plaintiffs’ allegations in this case. Among
17 other materials, I have reviewed the Amended Complaint, Plaintiffs’ Motion in
18 Support of Class Certification, and the supporting declarations of Jonathan Griglack
19 and Allan I. Schwartz filed in support of that motion.

20 31. I understand that Plaintiffs are or were both insured by GIC in California
21 at some point in the last several years. I also understand that Plaintiffs take issue with
22 the fact that United Services’ base rates for collision coverage are lower than GIC’s
23 base rates for the same coverage—which is true. But that does not necessarily mean
24 that any given GIC policyholder will end up paying a higher overall premium than a
25 similarly situated United Services policyholder; instead, determining any individual’s
26 premium is a highly individualized process based on the application of numerous
27 rating factors. (I am informed that other witnesses for USAA will be addressing that
28 issue in more detail.)

1 32. I also understand that Plaintiffs complain that USAA does not offer a
2 United Services auto insurance policy to all GIC policyholders who qualify as
3 statutory “Good Drivers” in California.

4 33. As I explained above, USAA provides auto insurance in California to
5 different segments of the military community in four different companies, including
6 United Services and GIC. And because insurance rates are set and approved based on
7 the specific characteristics (including historical loss experience and projected future
8 losses) of the specific pool of policyholders insured by each specific company, each
9 specific company necessarily has different rates for each type of coverage available in
10 California.

11 34. If USAA wanted to—or if a court ordered it to—charge all California
12 policyholders eligible for GIC (including enlisted personnel in pay grades E-1 through
13 E-6) and all California policyholders eligible for United Services (including those in
14 pay grades E-7 and above) the *exact same auto insurance rates* for all coverages, I can
15 think of four theoretical ways to try to do that. In short, they are:

- 16 a. apply GIC’s rate structure to USAA policyholders and charge
17 policyholders in both companies the GIC rates;
- 18 b. apply United Services’ rate structure to GIC policyholders and charge
19 policyholders in both companies the United Services rates;
- 20 c. take the second option one step further and *move* GIC policyholders into
21 United Services and charge everyone the United Services rates; or
- 22 d. move the policyholders of both companies into a new company and come
23 up with a new rate structure tailored to that combined risk pool.

24 The first three of those options are impossible because they’re illegal. The fourth is
25 theoretically possible, but presents a host of legal and practical challenges, with no
26 way of knowing which GIC policyholders would end up with higher or lower rates
27 even if it could be done. Below, I analyze each theoretical approach in detail.

28

1 35. **First**, USAA could theoretically try to change United Services’ base rates
2 and relativities to match those of GIC (in other words, charge everyone the GIC rates).
3 I doubt that the Plaintiffs would be satisfied with this approach, since it wouldn’t result
4 in any changes to their premiums. But here are some of the biggest issues with that
5 approach:

- 6 • As I explained above, in California, United Services may not charge rates
7 other than the rates that the CDI has approved. The existing United Services
8 rates were set on February 12, 2020, following the CDI’s approval. Before
9 that, the CDI had approved the United Services rates in effect between
10 August 1, 2019 and February 12, 2020 (the CDI had also approved the rates
11 in effect before that period).
- 12 • As I also explained above, there is an extensive regulatory process by which
13 an insurer like United Services can seek to change its approved rates. If
14 United Services wanted to (or was ordered to) change its California rates to
15 match those of GIC, United Services would need to obtain the CDI’s
16 approval before any such change could be made.
- 17 • As I also explained above, the CDI approval process can be lengthy and may
18 result in rates different from those for which the insurer applied. Here,
19 however, based on my experience and knowledge gained in my role at
20 USAA (including my group’s interactions with CDI and awareness of CDI’s
21 requirements and processes), I am certain that the CDI would never allow
22 United Services to change its rates to match the existing rates of GIC. That’s
23 because the inevitable result would be inappropriate rates for United Services
24 insureds, who present a different risk pool compared to GIC insureds.
- 25 • Again, the current CDI-approved rates for GIC are based on extensive data
26 specific to GIC’s members—including their historical loss and claims data.
27 Likewise, the existing CDI-approved rates for United Services are based on
28 similar data specific to United Services’ members. Each pool of members is

1 unique, with different risk profiles that result in different rates. In my
2 experience, the CDI would never permit an insurance company to set rates
3 for one group of insureds (United Services policyholders) based on the
4 expected loss and claims experiences of an *entirely different* group of
5 insureds (GIC policyholders).

6 36. **Second**, USAA could theoretically try to change GIC’s base rates and
7 relativities to match those of United Services (in other words, charge everyone the
8 United Services rates). But that would present all the same problems as the first
9 approach. GIC may charge only those rates that account for the risk profile of a
10 specific group of policyholders and that have been approved by the CDI. United
11 Services’ rates weren’t developed for the risk profile of GIC policyholders, and the
12 CDI hasn’t authorized GIC to charge its policyholders those rates. And for good
13 reason: rates must be calibrated to a specific risk pool while tracking the CDI’s
14 multitude of prescriptive requirements and limitations that apply to auto rates, in order
15 to ensure the rates are not inadequate, excessive, or unfairly discriminatory. So this
16 second theoretical approach simply is not legally allowable.

17 37. **Third**, USAA could theoretically try to switch all GIC policyholders in
18 California (or only a subset, such as those with collision coverage or those who qualify
19 as statutory “Good Drivers”) into United Services, allowing them to pay United
20 Services’ rates (in other words, partially or completely empty out GIC and move its
21 policyholders over to United Services). This, too, wouldn’t work:

- 22 • As a preliminary matter, USAA is not allowed to switch any policyholder
23 into a different insurance company in the middle of a policy period. Rather,
24 any fundamental changes (like switching insurers) would have to be done at
25 the policy renewal date.
- 26 • In addition, as I described above, the CDI requires USAA to file its
27 Placement Rules as part of the rate-application process, so the Placement
28 Rules are an integral component of USAA’s overall rates and rate structure

1 that the CDI approved. Under those Placement Rules, USAA is not
2 permitted to offer United Services insurance to those who do not qualify for
3 United Services—which by definition includes GIC’s members. So at the
4 very least, USAA would need to change its Placement Rules and obtain the
5 CDI’s approval if it wanted to (or was ordered to) insure some or all
6 California GIC policyholders in United Services.

- 7 • More fundamentally, though, the existing United Services rates were set on
8 February 12, 2020, following the CDI’s approval. Before that, the CDI had
9 also approved the United Services rates in effect between August 1, 2019 and
10 February 12, 2020 (and the prior rates in effect before that).
- 11 • The CDI approved United Services’ rates based on (among other things)
12 extensive historical loss data and claims experience, and projected future
13 losses and claims—that data is specific to United Services’ policyholders.
- 14 • Adding more than 100,000 policyholders—with different loss/claims
15 experience and different risk profiles—into United Services would
16 significantly change the collective risk profile of United Services’ member
17 pool. That would result in United Services’ current, CDI-approved rates
18 becoming excessive, inadequate, or unfairly discriminatory.²
- 19 • In this scenario, based on my experience, I am confident that the CDI would
20 not allow USAA to move thousands (or more than a hundred thousand) GIC
21 policyholders into United Services without revising United Services’ rates.
22 USAA would need to come up with entirely new rates and relativities for
23 United Services (based on the historical loss and claims experience
24

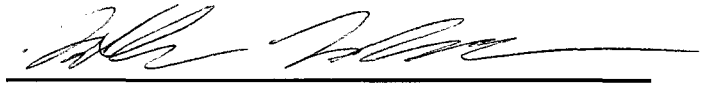
25
26 ² This would also be true if USAA tried to move only *some* GIC policyholders—such
27 as only those with collision coverage or only those who qualify as statutory “Good
28 Drivers”—into United Services. But it would also create an additional problem:
The remaining GIC policyholders would be stuck with rates that are no longer
based on their collective risk profile, so the GIC rates would also become
inadequate, excessive, or unfairly discriminatory.

1 applicable to this new combined insured pool) and then go through an
2 extensive process for seeking the CDI's approval.

- 3 • If USAA were to go through this above-described process of trying to change
4 United Services' rates and then seeking the CDI's approval, I have no idea
5 whether the CDI would allow it. And even if CDI did approve it, I have no
6 idea what the resulting rates and relativities would be. Nor do I have any
7 idea whether the resulting rates and relativities would produce higher, lower,
8 or the same premiums for any given GIC (or United Services) policyholder.

9 38. **Fourth**, USAA could theoretically try to combine all California GIC and
10 United Services policyholders into a new company and then recalculate common base
11 rates and relativities for that combined insured pool. Unlike the previous three options,
12 this one isn't per se illegal or violative of CDI procedures, and it is at least
13 theoretically workable. But once again, there would be significant practical issues:

- 14 • The change couldn't happen right away. There are many reasons for that, but
15 in the interest of simplicity I'll focus on two.
 - 16 ○ First, there would be significant regulatory hurdles. Combining
17 California GIC policyholders and California United Services
18 policyholders into a new company would require an entirely new set of
19 rates and relativities to be calculated, and USAA would have to go
20 through an entirely new regulatory process, which based on my
21 experience would likely take in excess of 12-18 months.
 - 22 ○ Among other things, because the CDI requires USAA to file its
23 Placement Rules as part of the rate-application process, USAA would
24 need new Rules approved before it could launch a new combined
25 company. (The current Rules require that United Services
26 policyholders and GIC policyholders are each in mutually exclusive
27 companies.)



Keith Wechsler

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EXHIBIT A

CALIFORNIA AUTO COMPANY OF PLACEMENT
RULES EFFECTIVE 3/22/2022

United Services Automobile Association (USAA)

- Commissioned and warrant officers in the U.S. Armed Forces:
 - on active duty, or in the Selected Reserve or National Guard; or
 - retired from active duty, Selected Reserve or National Guard; or
 - separated with a discharge type of “Honorable” or General under honorable conditions from active duty, Selected Reserve or National Guard.

- Senior non-commissioned/petty officers, defined as E-7 or above in the U.S. Armed Forces:
 - on active duty, or in the Selected Reserve or National Guard; or
 - retired from active duty, Selected Reserve or National Guard; or
 - separated with a discharge type of “Honorable” or General under honorable conditions from active duty, Selected Reserve or National Guard.

- Commissioned officers actively serving in the United States Public Health Service or the National Oceanic and Atmospheric Administration.

- Cadets, midshipmen, and officer or warrant officer candidates in a government-sponsored program leading to a commission. This includes those individuals:
 - who have accepted appointments to or are attending the military service academies or affiliated academy preparatory school;
 - who attended a military service academy and separated from the program prior to commissioning with the rank of “cadet” and a discharge type of “Honorable” or General under honorable conditions;
 - who are ROTC students if within 24 months of commissioning or in a scholarship program; and
 - who are candidates in an officer or warrant officer school.

- Un-remarried widow(er)s of members who are eligible to purchase a USAA policy. Does not include widow(er)s of widow(er)s.

- Regular employees and retired employees of USAA and its subsidiaries with five or more years of service who held an in-force USAA auto policy as of 09/16/2015. Employees or retirees that meet this criteria will no longer be eligible if they cancel or non-renew their existing policy.

USAA Casualty Insurance Company (CIC)

- Adult children (including stepchildren and wards) and un-remarried former spouses of USAA-eligible Sponsors. Does not include former spouses and children of widow(er)s of USAA-eligible Sponsors.
- Foreign Service officers and specialists who are actively serving in the Foreign Service of the U.S. Department of State.
- Special Agents actively serving in the Secret Service, Federal Bureau of Investigation, Drug Enforcement Administration, Naval Criminal Investigative Service, Air Force Office of Special Investigations, Army Criminal Investigation Command, and the Defense Criminal Investigative Service.
- Faculty and staff actively serving at the Merchant Marine Academy who hold commissions granted by the U.S. Maritime Administration.
- Remarried widow(er)s USAA-eligible Sponsors. Does not include widow(er)s of widow(er)s.
- Un-remarried widow(er)s of CIC-eligible Sponsors. Does not include widow(er)s of widow(er)s and former spouses.
- Unmarried widow(ers) of veterans who were retired from the military or died while actively serving and did not establish UMS membership prior to death.
- Regular employees of USAA and its subsidiaries with less than five years of service.
- Former (not retired) employees of USAA and its subsidiaries who established membership while employed.

USAA General Indemnity Company (GIC)

- Enlisted and junior non-commissioned officers, defined as E-1 through E-6 in the U.S. Armed Forces:
 - on active duty, or in the Selected Reserve or National Guard; or
 - retired from active duty, Selected Reserve or National Guard; or
 - separated with a discharge type of “Honorable” or General under honorable conditions from active duty, Selected Reserve or National Guard.
- Un-remarried widow(er)s of GIC-eligible Sponsors. Does not include widow(er)s of widow(er)s.

Garrison Property and Casualty Insurance Company (GAR)

- Adult children (including stepchildren and wards) and un-remarried former spouses of CIC, GIC, or Garrison-eligible Sponsors.
- Adult children (including stepchildren and wards) of USAA-eligible widow(er)s.
- Un-remarried former spouses of widow(er)s of UMS members.
- Remarried widow(er)s of CIC or GIC-eligible Sponsors.
- Widow(er)s of Garrison-eligible Sponsors.
- Widow(er)s of widow(er)s of UMS members.
- Small business owned by any member of UMS as shall be determined by management

EXHIBIT B

[THIS ENTIRE REPORT MAY BE MADE PUBLIC IN ACCORDANCE WITH THE PROVISIONS OF CALIFORNIA INSURANCE CODE SECTIONS 735.5(a), (b) and (c)]

**REPORT OF THE MARKET CONDUCT EXAMINATION OF THE
RATING AND UNDERWRITING PRACTICES, AS THEY RELATE TO
LAWS OTHER THAN CIC § 790.03, OF THE**

**GARRISON PROPERTY & CASUALTY INSURANCE
COMPANY
(NAIC #21253)**

AS OF AUGUST 31, 2010

ADOPTED ON MARCH 20, 2014

STATE OF CALIFORNIA



**DEPARTMENT OF INSURANCE
MARKET CONDUCT DIVISION
FIELD RATING AND UNDERWRITING BUREAU**

NOTICE REGARDING CONFIDENTIALITY

The provisions of Section 735.5(a), (b), and (c) of the California Insurance Code describe the Commissioner's authority and exercise of discretion in the use and/or publication of any final or preliminary examination report or other associated documents. Section 12938(b)(1) of the California Insurance Code requires the publication of certain legal documents and examination reports.

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STATE OF CALIFORNIA

DAVE JONES, *Insurance Commissioner*

DEPARTMENT OF INSURANCE

CONSUMER SERVICES AND MARKET CONDUCT BRANCH

FIELD RATING & UNDERWRITING BUREAU

100 South Spring Street, 11th Floor
Los Angeles, California 90013



March 20, 2014

The Honorable Dave Jones
Insurance Commissioner
State of California
300 Capitol Mall
Sacramento, California 95814

Honorable Commissioner:

Pursuant to instructions, and under the authority granted under the California Insurance Code Part 2, Chapter 1, Article 4, Sections 730, 733, and 736 and Article 6.5, Section 790.04; and Chapter 9, Article 6, Sections 1857.2, 1857.3, and 1857.4; an examination was made of the rating and underwriting practices and procedures in California of the:

GARRISON PROPERTY & CASUALTY INSURANCE COMPANY

(NAIC #21253, CDI #2015-3)

hereinafter referred to as either Garrison (GPCIC) or the Company. The California Department of Insurance will be referred to as the Department.

FOREWORD

This examination covered the rating and underwriting practices of the aforementioned Company during the period from June 1, 2010 through August 31, 2010. The Garrison Property & Casualty Insurance Company examination included a review of private passenger automobile business. The examination was made to discover, in general, if these and other operating procedures of the Company conform to provisions of the California Insurance Code (CIC), the California Code of Regulations (CCR), and other applicable insurance law.

This report contains only alleged violations of laws other than CIC § 790.03 that were identified during the examination. A separate report containing only alleged violations, if any, of CIC § 790.03 and its implementing regulations is made available for public inspection and is published on the Department's website pursuant to § 12938(b)(1) of the California Insurance Code. No violations of CIC § 790.03 or its implementing regulations were cited during this examination.

This report is written in a "report by exception" format. This report does not present a comprehensive overview of the subject insurer's practices. The report contains only a summary of pertinent information about the line of business examined and of the non-compliant or problematic activities or results that were discovered during the course of the examination, along with the insurer's proposals for correcting the deficiencies. All unacceptable or non-compliant activities may not have been discovered. Failure to identify, comment on, or criticize non-compliant activities in this state or other jurisdictions does not constitute acceptance of such practices.

Alleged violations identified in this report, any criticisms of practices, and the Company's responses, if any, have not undergone a formal administrative or judicial process.

SCOPE OF THE EXAMINATION

To accomplish the foregoing, the examination included:

1. A review of the rates, rating plans, forms, and underwriting rules made or adopted by the Company for use in California, including a review of records of data, statistics, or information maintained by the Company in support of or relating to such rates, forms, and rules.
2. A review of the application of such rates, forms, and rules by means of an examination of policy files and related records.
3. A review of the Company's advertising materials, which consisted of print advertisements published in military journals and magazines, product brochures distributed at military related events, postcards and other brochures distributed through direct mail, paid radio and cinema advertisements, banner advertisements placed on military related websites, and the Company's internet site at www.USAA.com.
4. A review of the Department's market analysis results, a review of any consumer complaints and inquiries received by the Department about this Company in the year prior to the start of the examination, a review of prior market conduct examination reports on this Company, and a review of any prior enforcement actions by the Department regarding this Company.

The examination was conducted principally at the Department's office in Sacramento, California.

EXECUTIVE SUMMARY

This examination included a review of policies that were issued, renewed, cancelled, non-renewed, or declined during the period of June 1, 2010 and August 31, 2010, referred to as the “review period,” and a review of the Company’s general practices and procedures related to rating, underwriting, advertising and marketing, and risk selection. The examiner reviewed 25 in-force policies and 32 terminated and declined policies. In the course of the examination, the examiners identified one rating error, one non-rating error, and one termination transaction error. Within the scope of this report, seven general practices were alleged as being in violation of California law. A total of \$85,967.21 has been returned to consumers as a result of this examination.

The main areas of concern identified in this examination included the use of unfiled group membership requirements for placement among the USAA underwriting companies (including GPCIC), the use of unfiled territory codes, the failure to follow the Company’s driver assignment rules, and the failure to properly determine principally at-fault status of existing accidents for new business risks. Details regarding the examination results are provided in the final section of this report.

RESULTS OF THE REVIEW OF MARKET ANALYSIS,
CONSUMER COMPLAINTS AND INQUIRIES, PREVIOUS EXAMINATIONS,
AND PRIOR ENFORCEMENT ACTIONS

The results of the market analysis review revealed that from October 1, 2007 to September 30, 2010, the Company was the subject of one regulatory action of significance taken by the state of Maryland. The action alleged improper policyholder service. This issue was not reflected in the results of this examination.

Within the scope of this report, the Company was the subject of five California consumer complaints closed between October 1, 2009 and September 30, 2010 none of which were determined to be justified. The review of complaints revealed no specific areas of concern.

There have been no prior California rating and underwriting examinations of the Company.

METHOD OF DOING BUSINESS

Garrison is part of the USAA Property and Casualty Group (Group NAIC #0200). The Company is a direct writer, with policy sales, service, and underwriting handled through salaried service representatives at its home office in San Antonio, Texas and three regional offices. Claims are handled through salaried claims representatives in its home office, regional offices, and field offices. GPCIC directly markets to eligible insureds in all geographic areas. Potential and current insureds are able to contact the Company by toll-free telephone, internet, or mail. The Company does not use Managing General Agents.

AUTHORIZED CLASSES OF BUSINESS

The Company is authorized to transact the following classes of business in California:

<u>Class No.</u>	<u>Class Of Insurance</u>
2.	Fire
3.	Marine
7.	Plate Glass
8.	Liability
12.	Burglary
16.	Automobile
20.	Miscellaneous

PREMIUM AND LOSS EXPERIENCE STUDY

The following table shows the California premium and loss experience for Garrison by line of business for calendar year 2009, based on data from the Statutory Page 14 of the Annual Statement filed with the Department. The loss ratio for each line is calculated by dividing Direct Losses Incurred by Direct Premiums Earned.

Garrison Property and Casualty Insurance Company
California Premium and Loss Experience by Line for the Year 2009

Line Of Coverage	Direct Premiums Written (\$)	Direct Premiums Earned (\$)	Direct Losses Incurred (\$)	Loss Ratio (%)
Fire	427,452	324,671	16,685	5%
Allied lines	321,419	243,934	129,184	53%
Homeowners multiple peril	7,851,961	6,062,403	2,596,975	43%
Inland marine	448,050	365,067	195,476	54%
Earthquake	739	673	0	0%
Other liability	143,981	114,410	39,036	34%
Private passenger auto liability	11,461,064	10,087,102	8,225,474	82%
Private passenger auto physical damage	9,758,828	9,209,175	5,877,748	64%
TOTALS	\$30,413,494	\$26,407,435	\$17,080,578	65%

LINES OF BUSINESS REVIEWED

The Garrison Property and Casualty Insurance Company examination included a review of the following line of business.

Private Passenger Automobile

Rates Filed: August 13, 2007
Rate Page Edition: November 25, 2007

Rates Filed: May 17, 2010
Rate Page Edition: August 1, 2010

Garrison's private passenger automobile program provides protection for a covered person's legal liability arising out of the ownership, maintenance, or use of a motor vehicle. The program is available to both good drivers and non-good drivers provided they meet the Company's eligibility guidelines. In addition to multiple liability coverage options, the policy may also provide coverage for medical expenses, physical damage to owned and non-owned vehicles, towing and labor services, and rental reimbursement.

California Automobile Assigned Risk Plan (CAARP)

Insurers that sell private passenger automobile policies are required by law to accept risks that are assigned to them by the California Automobile Assigned Risk Plan. Garrison has a limited assignment distribution (LAD) agreement with National Liability and Fire Insurance Company to handle its Assigned Risk policies. Therefore no CAARP policies were reviewed during the examination.

DETAILS OF THE CURRENT EXAMINATION

The following sections of the report provide summary information regarding the policy review, and regarding the statutes and regulations that were cited during the examination.

POLICY REVIEW RESULTS

The policy sample was reviewed to determine if the Company was properly and consistently applying its adopted rates, rating plans and underwriting rules at the individual policy level. The policies were selected at random from the Company's listing of policies issued, renewed, non-renewed, cancelled, or declined during the period of June 1, 2010 through August 31, 2010. The results of this review are listed below on the In-Force Policies table and the Terminated and Declined Transactions table.

The In-Force Policies table shows the number of policies reviewed, the number of policies with rating errors, the number of policies with non-rating errors, and the error ratios by program and company resulting from this examination. In general, policies containing rating errors that result in premium overcharges are corrected by policy endorsement, and refunds are made to the policyholder. Policies with errors that result in undercharges are marked for corrective action at the next policy renewal date. Non-rating errors include forms, documentation, and other errors not affecting premium. (Errors that result in premium changes under \$5 or 1% of the policy premium, whichever is greater, are counted as non-rating errors.)

The Terminated and Declined Transactions table shows the number of termination transactions reviewed per line of business. These include policies which had been cancelled, non-renewed, or declined. The number of policies with errors noted in the termination transaction is shown, as well as the overall ratio of terminations with errors.

GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY

Policy Review Result Summary Tables

In-Force Policies

Program	No. of Policies Reviewed	No. with Rating Errors	Rating Error Ratio %	No. with Non-Rating Errors	Non-Rating Error Ratio %
Private Passenger Automobile					
GPCIC	25	1	4%	1	4%
TOTALS	25	1	4%	1	4%

Terminated and Declined Transactions

Program	No. of Policies Reviewed	No. with Errors	Error Ratio %
Private Passenger Automobile			
Declined	11	0	0%
Non-Renewed	6	1	17%
Cancelled	15	0	0%
TOTALS	32	1	3%

GENERAL PRACTICES REVIEW RESULTS

The examination included a review of the rates, rating plans, forms, and underwriting rules made or adopted by Garrison for use in California. The table below identifies the provisions of the California Insurance Code (CIC), the California Code of Regulations (CCR), or other pertinent law for which violations were alleged or to which reference was made during the examination. A total of 16 laws were cited based on the insurer's errors and general practices. Each law listed on the following table may be due to a general practice which affects many policyholders. One practice can also violate multiple laws or occur across multiple Companies within an insurer group.

SUMMARY OF RELEVANT LAWS

	Code Citation	Description of Law
1.	CIC § 780	An insurer shall not cause or permit to be issued, circulated or used, any statement that is known, or should have been known, to be a misrepresentation of the terms of a policy issued by the insurer or sought to be negotiated by the person making or permitting the misrepresentation, the benefits or privileges promised thereunder, or the future dividends payable thereunder.
2.	CIC § 1861.01(c)	Insurance rates for most property and casualty lines must be approved by the Commissioner prior to their use.
3.	CIC § 1861.02(b)	Every person who qualifies as a Good Driver shall be eligible to purchase a Good Driver Discount Policy from the insurer of his or her choice.
4.	CIC § 1861.025(a)	This section sets forth the criteria in which a person is qualified to purchase a Good Driver Discount policy.

	Code Citation	Description of Law
5.	CIC § 1861.05(a)	Rates shall not be excessive, inadequate, or unfairly discriminatory.
6.	CIC § 1861.05(b)	Every insurer which desires to change any rate shall file a complete rate application with the commissioner.
7.	CIC § 1861.16(b)	An insurer shall offer and sell a good driver discount policy to a good driver from an insurer within a common ownership, management, or control group, which offers the lowest rates for that coverage.
8.	CCR § 2360.0(b)	Eligibility Guidelines are specific, objective factors, or categories of specific, objective factors, which are selected and/or defined by an insurer and which have a substantial relationship to an insured's loss exposure.
9.	CCR § 2360.2	An insurer shall maintain eligibility guidelines for every line of insurance offered for sale to the public, which shall be sufficiently detailed to determine the appropriate rating plan for the insured.
10.	CCR § 2360.3	An insurer shall charge each insured the lowest premium for which the insured qualifies.
11.	CCR § 2360.4	It shall be the insurer's responsibility to determine the lowest premium for which each insured qualifies. If the insurer delegates this responsibility to its agent, the insurer shall remain responsible for the agent's determination.
12.	CCR § 2360.5	Any two or more insurers which are members of an insurer group and use the same marketing system and eligibility guidelines for the same or similar insurance, shall place the insured with the company which would charge the lowest premium.
13.	CCR § 2632.11(g)	Any change to an approved class plan or values assigned to the rating factors requires prior approval of the Commissioner.

	Code Citation	Description of Law
14.	CCR § 2632.13(f)(1)	<p>If a driver had insurance that provided coverage for an accident, a subsequent insurer which did not provide coverage at the time of the accident and to whom an application for the issuance of a policy of insurance is made, or from whom a renewal policy is offered, may not consider the driver to be principally at-fault for the accident unless the following circumstances apply:</p> <p>(1) if the insurer that provided coverage at the time of the accident charged the driver with a violation point for the accident in accordance with this Section, or the predecessor of this Section;</p>
15.	CCR § 2632.13(j)	<p>In determining eligibility to purchase a good driver discount policy, the requirement that the driver have been licensed to drive a motor vehicle for the previous three years shall mean that the driver has been licensed to drive in any jurisdiction.</p>
16.	CCR § 2632.14(b)	<p>Insurers shall offer and sell good driver discount policies under the same terms and conditions and with the same options and services that the insurer offers and sells to the public for any other automobile insurance policy.</p>

SUMMARY OF EXAMINATION RESULTS

During the Garrison Property and Casualty Insurance Company examination, seven general practices were alleged to be in violation of California law within the scope of this report.

In response to each of the Department's allegations of non-compliance, the Company was required to identify remedial or corrective action that was or will be taken to correct the deficiency. Regardless of actions taken or proposed by the insurer in this report, it is the insurer's obligation to ensure that compliance with California law is maintained continuously.

Any non-compliant practice identified in this report may extend to other jurisdictions. The Company was asked if it intended to take corrective action in all jurisdictions where applicable.

The Company indicated that these practices are not applicable in other jurisdictions.

A total of \$85,967.21 was returned to consumers as a result of this examination.

Garrison's implementation of corrective actions based on this examination will continue to be reviewed by the Field Rating and Underwriting Bureau.

Private Passenger Automobile

1. New and renewal policy packets included a supplemental information page which displayed the monies saved by the annual mileage discount being applied to the policy premium. During the policy review, it was observed that the rating factors at the 10,500 – 12,000 mile rating bands included both debits and credits being applied to different coverages, which could result in an overall premium increase based on the factors used. However, the premium discount displayed on the supplemental information page only provided the total monetary impact of the credits applied and did not display, or include an adjustment for, the corresponding surcharge, even in situations where the overall result was a premium increase. As such, the Company did not accurately represent the total premium impact of the annual mileage factors, which is potentially misleading. Garrison's misrepresentation of the terms of its policies is a violation of the Insurance Code.

CIC § 780

Summary of Insurer Response: GPCIC stated it does not believe that this constitutes a violation of CIC § 780. The Company stated its intent was to inform the policyholder of factors that decreased the premium. However, the Company stated that it implemented programming changes in November, 2012 so that the supplemental information page will generate only when the net result is a premium discount.

2. The Company failed to properly verify at-fault accident status prior to assessing at-fault accident surcharges. It was observed GPCIC relied upon use of the Comprehensive Loss Underwriting Exchange (CLUE) without verifying with the insured or prior insurer that the prior insurer had found the insured to be principally at fault, as required by regulation during the review period.

CCR § 2632.13(f)(1)

Summary of Insurer Response: As the regulatory requirements changed on December 11, 2011, the Company confirmed its new process includes obtaining a CLUE report and verifying the accuracy of the information with the insured. The Company will only charge for an at-fault accident found on the CLUE report, not disclosed on the application, when the CLUE report provides all of the information as required by the California Code of Regulations that became effective December 11, 2011. In other situations, the Company will gather sufficient information for the insured or driver to confirm fault, in accordance with the California Code of Regulations that became effective December 11, 2011.

3. Garrison's filed billing plan stated that new business was required to make a 'first payment' prior to policy issuance. The Company further clarified that it would collect 30 days premium if the member elected not to pay his/her premium in full, also that the Company reserved the right to require full payment of premium if the insured's payment history was unsatisfactory. However, during the policy review the Company stated that it utilized a down payment model which used the insured's payment history with the USAA Group, collision coverage, and presence of enterprise collateral (such as products with USAA's Federal Savings Bank or investment company) to determine the down payment amount. As the Company was not following its filed guidelines, the examiner was unable to verify if good drivers were being offered the same terms and conditions that the insurer offers and sells to the public. Because there was more than one set of billing plans in place, it was unclear if the Company was treating similar risks in a consistent fashion as required by law. CIC §§ 1861.02(b) and 1861.05(a), CCR § 2632.14(b)

Summary of Insurer Response: The Company stated it does not believe it is treating similar risks in a dissimilar or unfairly discriminatory fashion, nor does it believe it is applying CIC § 1861.02(b) and CCR § 2632.14(b) inconsistently. However, the Company did agree to provide a detailed explanation of its current billing process and agreed to file an updated version. Currently the Company requires a down payment of 0%, 16%, or 100% based upon an insured's payment history on previous USAA insurance policies, ownership of other USAA products, and military status (i.e. returning from deployment). If an insured has had no non-payment cancellations (NPCs) in the prior five years and has one or more other USAA products, then no down payment is required (0%). If an insured has had either no NPCs and no other USAA products, or one NPC in the prior five years, then a 16% down payment is required. Finally, full payment is required (100%) if the insured has had two or more NPCs in the prior five years. Additionally, the Company confirmed that collision coverage is not a billing related factor and acknowledged previously making note of it was an internal communication error. The Company provided additional documentation to demonstrate the policies included in the examination were treated in accordance with the above noted guidelines.

4. The Company's Good Driver Discount Guidelines noted that the discount was only available if the driver had been continuously licensed to drive in the U.S., U.S. Territories/Possessions, or Canada for the preceding three years (18 months of which may be from driving experience outside of said jurisdictions). The definition of "Good Driver" in California law does not require a driver to have been licensed to drive in the U.S., U.S. Territories, or Canada to qualify for the discount.
CIC § 1861.025(a), CCR § 2632.13(j)

Summary of Insurer Response: GPCIC noted that its California Personal Auto Manual, provided on September 23, 2010, allowed driving experience from any jurisdiction to be counted towards the insured's years of driving experience. The Company also stated, as of September 26, 2012, that it had already modified its acceptability guidelines to ensure they were consistent with its California Personal Auto Manual and California law.

5. The examination revealed that the Company was not following the driver assignment rules included in its filed and approved class plan. Garrison failed to use the characteristics of the highest rated driver to develop the premium of the highest rated vehicle when there were more operators than vehicles listed on the policy. By not following its approved class plan the Company has potentially been charging inadequate or unfairly discriminatory rates in violation of state law. Additionally, changes to an approved class or rating plan must be filed and approved by the Commissioner prior to its use.
CIC §§ 1861.01(c) and 1861.05(a), CCR § 2632.11(g)

Summary of Insurer Response: GPCIC identified the problem as a system error. The Company stated the good driver and premier operator discounts were not applied to the equation used in determining the highest rated operator. The Company corrected the system logic on May 19, 2012. Additionally, Garrison confirmed that this system error did not result in any policyholders being overcharged.

6. Garrison's filed and approved rate filing (07-5430) and class plan (07-5421) provided a list of California's 5-digit zip codes and the corresponding territory codes used for determining the applicable rating factors. However, the Company was using a program, referred to as the "GIS" system, to determine the territory codes. Instead of using the insured's 5-digit zip code as filed, the GIS system utilized the insured's "zip code plus 4" information, which resulted in the application of territory codes other than those filed with the 5-digit zips. By using the rating factors of territory codes derived from the GIS system and not those filed with and approved by the commissioner the Company has been charging inadequate, excessive, or unfairly discriminatory rates. Additionally, the Company failed to file a rule for determining the territory factor for newly created zip codes. As such, GPCIC has violated the prior approval requirements of the Insurance Code and Code of Regulations.
CIC §§ 1861.01(c), 1861.05(a), and 1861.05(b), CCR § 2632.11(g)

Summary of Insurer Response: The Company stated that it does use its filed and approved zip codes and corresponding territory codes. However, Garrison also acknowledged that it

relies on geospatial data technology which considers the zip code plus 4-digit information. In response to the exam findings, the Company submitted an updated rate filing on October 24th, 2012, which clarified its use of the plus 4-digit information and application of territory codes absent this information when multiple territorial rating factors are identified in a single zip code and when new zip codes are added. The Company has identified 593 policies that were overcharged due to the use of the plus 4-digit methodology before the Company had approval to do so. A total of \$85,967.21 was refunded to these insureds in May of 2013.

7. Garrison Property and Casualty Insurance Company (Garrison or GPCIC) is part of the USAA Property and Casualty Group (USAA Group or Group). The USAA Group is also comprised of three other Companies: United Services Automobile Association (USAA), USAA Casualty Insurance Company (USAA-CIC), and USAA General Indemnity Company (USAA-GIC). All four companies use the same type of Insurance Marketing System and offer the same coverage options under identical coverage forms. At the time of the examination USAA-CIC and GPCIC had the same base rate while USAA had a lower base rate and USAA-GIC had a higher base rate.

Per the filed and approved rating plans for the four companies, eligibility for each company is based on group membership as follows: USAA insures active military officers and non-commissioned officers while USAA-GIC insures active military enlisted personnel and USAA-CIC insures dependents of USAA members. Garrison Property and Casualty Insurance Company insures former dependents of members of USAA-CIC, USAA-GIC and GPCIC.

Although USAA had the filed general framework described above, the following problematic behaviors became apparent through the Department's examination of GPCIC:

- The Group had a set of internal company placement criteria that were more specific than the general framework identified for who qualifies for each group.
- GPCIC did not in every instance reviewed by the examiner adhere to general framework or the more specific internal criteria for company placement of members.
- GPCIC did not appear to re-evaluate group membership qualification at each renewal. Therefore when an insured's status changed to where he would now be eligible for a group that receives a lower rate, he does not receive that benefit. Conversely, insureds no longer eligible for group membership were allowed to retain a better rate than they were eligible for. This results in the application of unfairly discriminatory rates.
- Over time, the Group has made changes to the general framework and the specific internal company placement criteria. Changes to the general framework and specific criteria were not provided to the Department's Rate Regulation Branch (RRB).

Under the provisions of CIC § 11628(f), insurers are authorized to limit the issuance and renewal of insurance to persons who are or were engaged in military or governmental service, their spouses, dependents, direct descendants, and former dependents or spouses. Under CIC § 1861.12, USAA Group is permitted to offer personal auto coverage to distinct affinity groups at different rate levels, with the rates for each group being based on the experience of the members of that group. Therefore, the insurer must have a clear definition

of who qualifies to be a member of the affinity group and must file that information with CDI with the rate filing for the group rate. If the insurer makes material changes to the parameters for who qualifies to be a member of the group, the insurer must file that information with RRB again and either demonstrate that the change has no impact on what the appropriate rate for the group should be, or account for that impact by requesting an appropriate rate change. Insurers are also responsible for ensuring each risk pays the lowest premium for which he qualifies (CCR § 2360.3). If an insurer has multiple affinity group rates, the insurer must have a process for making sure insureds are in the group which affords them the lowest premium, including addressing any changes in risk status that would make them eligible at renewal for a lower rated group.

The failure to file updated affinity group membership definitions violates the prior approval provisions of California law and may adversely affect the validity of the rate level established for each affinity group. In addition, the failure to place an insured in the lowest priced company for which he qualifies at new business and at each subsequent renewal may result in the application of excessive or inadequate rates.

CIC §§ 1861.01(c), 1861.05(a) and (b), and 1861.16(b), 2360.0(b), 2360.2, 2360.3, 2360.4, and 2360.5

Summary of Insurer Response: GPCIC provided a copy of the Group's more specific detailed company placement guidelines, which delineate the mutually exclusive placement of insureds. GPCIC also provided a list of the regular, multi-pronged processes in place to ensure that an insured's company placement status remains up to date. GPCIC believes that it has consistently applied its general framework and specific placement guidelines. GPCIC further believes that the USAA Group complies with the requirements of Prop 103 and that they do not constitute affinity groups pursuant to CIC § 1861.12. GPCIC also believes that their eligibility guidelines do not constitute rating factors under Proposition 103 and are not required to be filed with the RRB.

Summary of Department's Evaluation of Insurer Response: Neither Garrison nor the USAA Group has made a filing of the specific group membership requirements for each company to address this issue. At this time this issue remains unresolved and may result in administrative action.

EXHIBIT C

DEPARTMENT OF INSURANCE

Legal Division, Rate Enforcement Bureau

45 Fremont Street, 21st Floor
San Francisco, CA 94105



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December 10, 2014

Via Email

Robert J. Cerny, Esq.
Hinshaw & Culbertson LLP
633 West 5th Street, 47th Floor
Los Angeles, CA 90071-2043

Re: Noncompliance Issues: 1) Failure to sell auto insurance to all statutory good drivers or limit the sale of auto insurance to Military; and 2) Failure to file and follow group placement guidelines as directed in the Field Rating and Underwriting Bureau (FRUB) Exam Report adopted March 20, 2014

Group: USAA Property and Casualty Group
Companies: Garrison Property & Casualty Ins. Co.; United Services Automobile Association; USAA Casualty Insurance Company; and USAA General Indemnity Company (Group and Companies collectively referred to as "USAA")

Dear Mr. Cerny:

As we discussed by phone on December 10, 2014, the California Department of Insurance (CDI) demands that USAA immediately:

1. Stop issuing auto policies to employees who are not current or former governmental or military personnel or their dependents or spouses, as defined in California Insurance Code ("CIC") § 11628 (f) ("Military"). Alternatively, start offering auto insurance to all statutory good drivers. CIC § 1861.02 requires auto insurers to offer and sell auto insurance to all statutory good drivers that request it. Absent strict compliance with CIC § 11628(f), USAA must offer and sell auto insurance to all statutory good drivers that request it regardless of whether the driver is Military.

CDI recently learned that USAA does not comply with CIC § 11628(f) because it sells auto insurance to its non-Military employees. If USAA does not immediately stop selling policies to non-Military, it will lose the protection of CIC § 11628(f) and be required to start selling auto insurance to all statutory good drivers by January 30, 2015.

Robert J. Cerny, Esq.
Hinshaw & Culbertson LLP
December 10, 2014
Page 2

2. Make a new Rule Filing with CDI's Rate Regulation Bureau ("RRB"), incorporating USAA's current Internal Placement Criteria and agree to promptly file future updates or changes of USAA's Internal Placement Criteria with RRB.

In the FRUB Exam Report adopted on March 20, 2014, CDI advised USAA:

[The] insurer must have a clear definition of who qualifies to be a member of the affinity group and must file that information with CDI with the rate filing for the group rate. If the insurer makes material changes to the parameters for who qualifies to be a member of a group, the insurer must file that information with RRB again and either demonstrate that the change has no impact on what the appropriate rate for the group should be, or account for that change by requesting an appropriate rate change. Insurers are also responsible for ensuring each risk pays the lowest premium for which he qualifies (CCR § 2360.3). (2014 FRUB Exam Report, at p. 19.)


"No rate shall be approved or remain in effect which is excessive, inadequate or unfairly discriminatory." (CIC § 1861.05.) To assure compliance with this provision, USAA must notify the Commissioner of USAA's eligibility parameters/group definitions and any changes thereto. This is so regardless of whether the group is an affinity group pursuant to CIC § 1861.02 or a military group pursuant to CIC § 11628(f). All information provided to the Commissioner pursuant to CIC § 1861.05 must be available for public inspection. (CIC § 1861.07.)

Based on the above, USAA must file its current "Internal Placement Criteria" with RRB and notify RRB whenever it changes its criteria. USAA must also provide CDI with a plan to ensure each customer pays the lowest premium for which he or she qualifies.

Conclusion:

Thank you for your immediate attention. If USAA does not comply by January 30, 2015, CDI will consider a noncompliance action. In assessing penalties, CDI will consider the noncompliance issues identified in the FRUB Exam Report adopted on March 20, 2014.

CDI proposes an in-person meeting to discuss this matter on **December 22, 2014 or January 12, 2015**. Please confirm one of those dates by December 15, 2014.

Sincerely,

Jennifer McCune