



**Annual Report of the
Commissioner of Insurance**

**To
The Colorado General Assembly**

**On
Complaints Against Insurers**

FY 2005-2006

September 29, 2006

Introduction and Statutory Authority

The statutory priorities for the Colorado Division of Insurance are to:

1. Regulate insurance to ensure that insurance rates are not excessive, inadequate, or unfairly discriminatory;
2. Give consumers the greatest choice of policies at the most reasonable cost possible;
3. Permit and encourage open competition between insurers on a sound financial basis;
4. Avoid regulation of insurance rates except as specifically authorized; and
5. Require all persons having to do with insurance services to the public to:
 - a. Act with good faith in everything pertaining thereto;
 - b. Abstain from deceptive and misleading practices; and
 - c. Keep, observe and practice the principles of law and equity in all matters pertaining to such business.

CRS 10-1-101. To effectuate these statutory goals, the operational goals of the Division of Insurance are that:

1. Consumers have as many legitimate choices as possible;
2. To make these choices, consumers need information; and
3. Companies competing for consumer's business must comply fully with the rules and laws of Colorado.

The Division of Insurance's ICARE (Insurance Consumer Awareness and Regulatory Enforcement) Section has primary responsibility for handling complaints, including investigating the allegations of complaints and working with consumers, providers, carriers, employers and others to ensure that the insurance policy provisions, laws and regulations are followed. ICARE deals with all types of insurance -- health, life, auto, homeowners, inland marine, viatical settlements, etc.

Overview of the Complaint Process

Concerns about how insurance companies and health carriers are dealing with individual consumers come into the Division of Insurance (DOI) in many ways – telephone, fax, e-mail, the DOI’s website complaint form, and walk-in visitors. In addition, inquiries and complaints are lodged with the Division’s ICARE Section from individual consumers, employers, providers and provider groups, insurance producers (agents and brokers), legislators on behalf of constituents, and even from companies about their competitors.

The ICARE Section makes a distinction between inquiries, which generally come into the Division by telephone call or e-mail and are generally more informational in nature, as opposed to formal complaints and protests that are required to be in writing and assert a specific dispute or disputes.

Inquiries are often made by persons seeking general information. They include consumer questions about what the insurance laws and regulations require, asking whether a company or producer is licensed by Colorado, how to reach the company, and/or what avenues or options a consumer has to question an insurance company or health carrier’s determinations. Others include producer and company calls about where a particular issue is addressed in the statutes or regulations.

Complaints, as distinguished from inquiries, are more specific and are required to be in writing or filed on-line through the Division’s website. They require specific information about what company is involved, including type of coverage, policy number, claim number, contact information for the insurance agent, a description of the issue and a statement of what resolution is desired.

For both inquiries and complaints, the first thing the ICARE staff does is to determine whether the Division of Insurance has jurisdiction. Particularly in the health area, the Division may not have jurisdiction to assist consumers because the plan is not regulated by the Colorado Division of Insurance. This would include plans such as: government employee plans; self-funded employer plans and labor-management trust plans; Medicare; Medicaid; the Child Health Plus plan; and plans and policies written and issued outside of Colorado. If the Division of Insurance does not have jurisdiction, the complainant is so notified and advised of the correct complaint contact information.

Once the threshold question of the Division’s jurisdiction is made, a staff member of ICARE is assigned to review it and to conduct an investigation. The assigned staff member sends a letter to the company on behalf of the consumer enclosing a copy of the consumer’s complaint. The consumer is copied on all correspondence between the company and the DOI pertinent to the specific complaint. The company is given a specified time period, usually 30 days, to research and respond to the consumer’s complaint, though they may request an extension, which, if warranted, may be granted.

When the company's response is received, the staff member reviews it, ensures the consumer has received a copy, and determines if the law, a regulation, or a contract provision has been violated. If a violation has occurred, the Division may issue a show cause order as preparatory to imposing a fine on the company or licensed producer. Moreover, the company or producer may be ordered to comply with the laws, regulations and policy provisions in the matter at-hand and in all future transactions pertaining to the subject matter of the complaint. If the investigation indicates criminal violations or activity, i.e. an unlicensed company or producer, the matter may be referred to the Division of Insurance's Investigations Unit for further work or to the Attorney General's office for prosecution.

Once a matter has been resolved, both the consumer and the company are informed of the outcome of the complaint and closure of the Division of Insurance file. For quality control purposes, consumers are sent a file-closing postcard asking for their evaluation of the ICARE staff's handling of the matter.

Complaint statistics and trends are regularly evaluated by Division of Insurance staff to assess what are the "Hot Consumer Topics" and to determine whether a pattern or practice is developing by a single company or within a segment of the industry. This analysis may lead in one or more directions – clarification of the Division of Insurance's interpretation of a law or regulation via a bulletin, amendment of a regulation to strengthen those provision, or recommendation for a change in statute. Trends and analysis of the complaint statistics also identify issues to be reviewed in scheduled market conduct examinations, or may trigger a special, targeted market conduct investigation, desk audit or market analysis of the identified issues. The ICARE Section also uses this information to determine what additional consumer and producer education or information needs to be made available and it develops and puts this information into the marketplace, including on the Division's website at www.dora.state.co.us/insurance.

Complaint Analysis and Trends

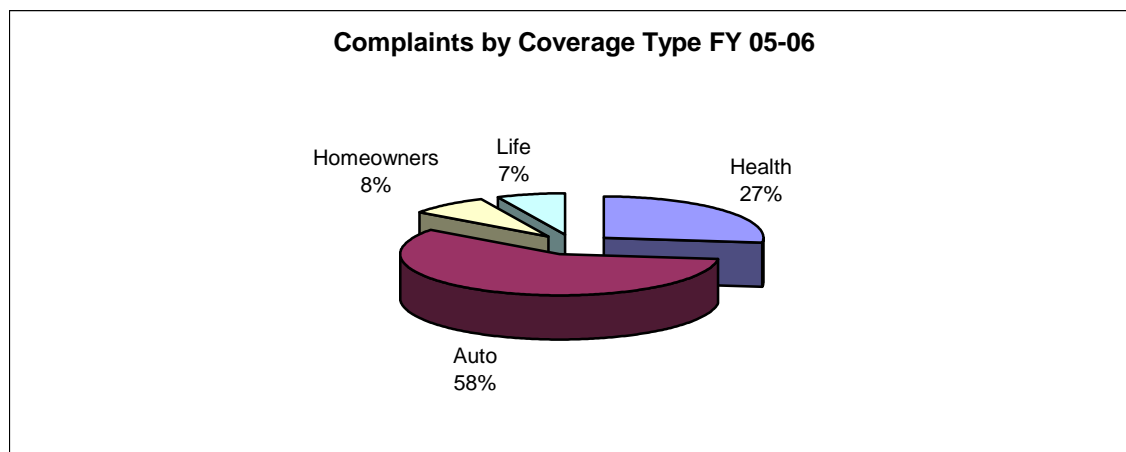
The Division of Insurance ICARE Section logs over 31,000 telephone calls, e-mails, walk-ins, and other contacts with consumers over a typical 12 month period, an average of over 2,600 a month. For FY 2005-06, in the ICARE Section, 4,111 of these were logged complaints or auto protests, and 14,588 were logged as inquiries. The complaints break down to approximately 41% concerning Property and Casualty issues (with auto protests representing another 29%), and 30% involving Life, Accident and Health. It should be noted that the Property and Casualty section handles private passenger auto, including PIP and medical payment coverage, along with homeowners, title, and commercial insurance issues. The Life, Accident and Health issues include long-term care, individual and group health coverages, annuities, Medicare Supplement and credit life and health policies.

In FY 2005-06, the ICARE Section handled complaint files as follows:

	Life, Accident and Health	Property and Casualty*	Total
Opened Complaints	1,238	2,873	4,111
Closed Complaints	1,113	2,843	3,956

* Includes auto protests

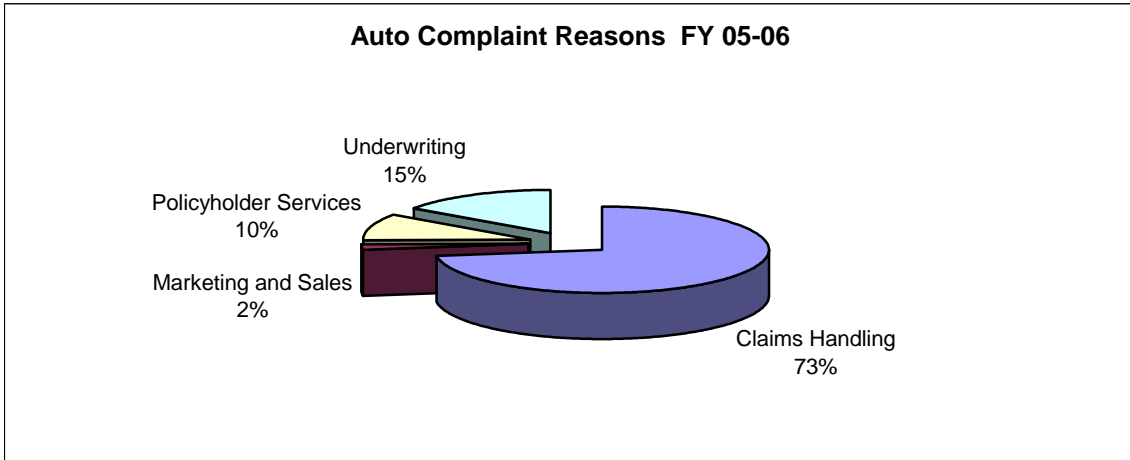
The breakdown of complaints by the type of coverage is:



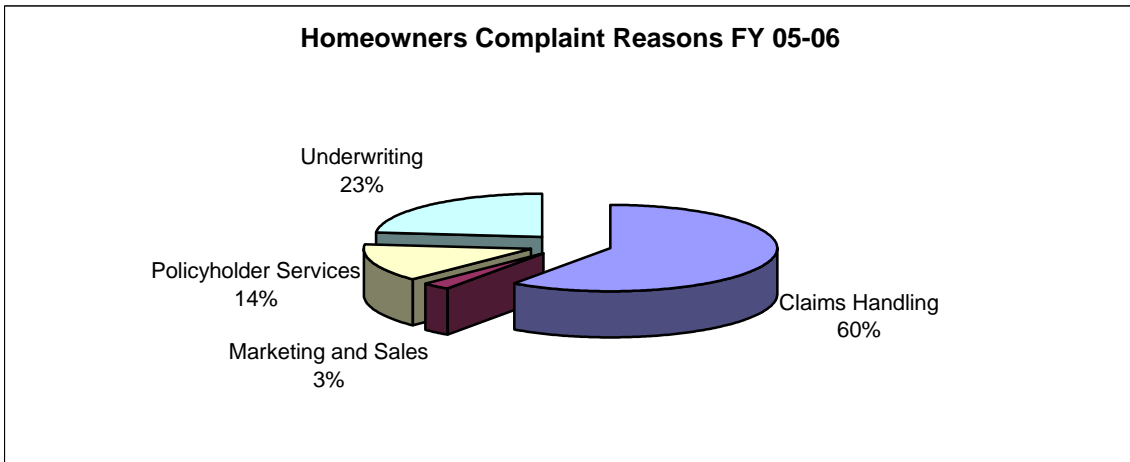
Of the auto complaints (including auto protests), 95% of the complaints involved private passenger auto, 3% commercial auto, and the remainder spread among motorcycle, motorhome, and rental insurance issues. For health complaints, 56% are about group health policies, 43% concern individual health policies, with a few complaints about

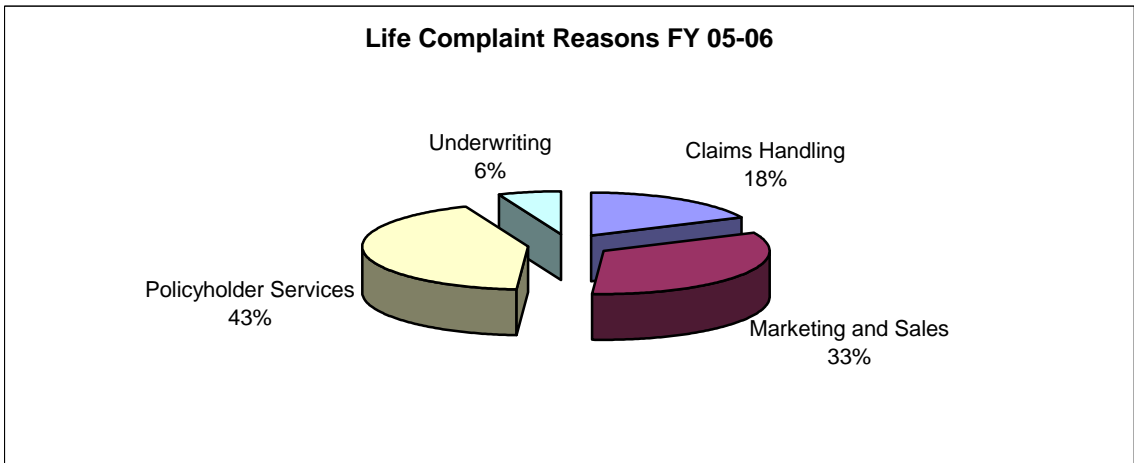
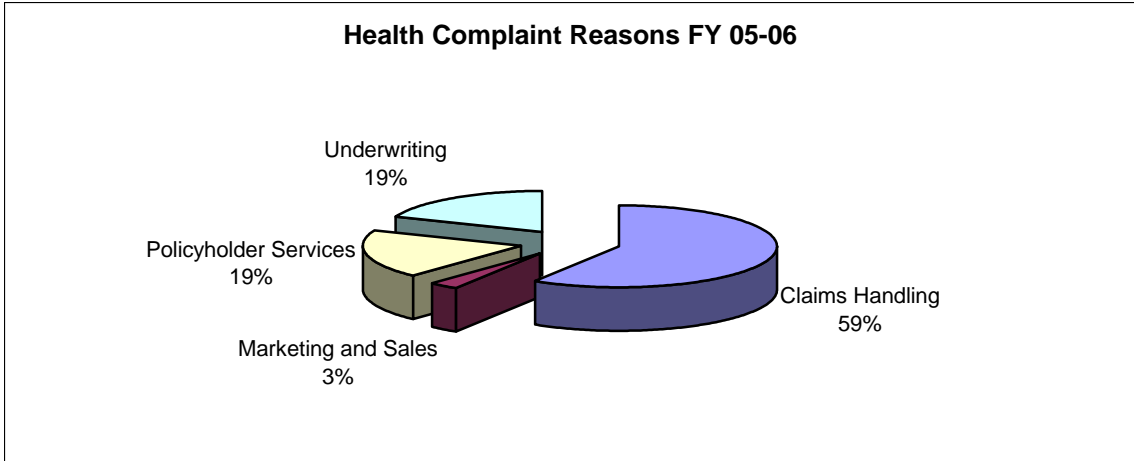
credit health insurance or other types of coverage. Eighty-two percent of homeowners' complaints are for single family homes, with 6% each for condo/townhouse coverage and for renters/tenants. For life insurance, 70% of complaints involve individual or group life policies and 28% concern annuities issued by life insurance companies.

Looking at the subject area of the complaints, they broke down as follows for each of the major types of insurance:



Note: Does not include auto protests which for the over 1,200 complaints in the year, the reason was identified as underwriting.





The percentages may not total to 100% due to rounding, some complaints have multiple reasons, and we have included only the top reason areas.

Underwriting issues generally involve complaints about how premiums are calculated. The top three specific issues in Property and Casualty underwriting are premium and rating (50%), surcharges (36%), and cancellation of policies (7%). For Life and Health policies with underwriting complaints, the top three issues are premium and rating (29%), cancellation (25%), and health status (15%).

Claims handling involves claim payment delays and claim denials. For both Property and Casualty and Life and Health complaints, the top three reasons are denials of claims (25%/ 34%), delay (25%/ 18%), and unsatisfactory settlement offers (17%/14%).

Marketing and Sales complaints often reflect problems with producers or in the sales and marketing materials. For FY05-06, complaints in the Property and Casualty area concerned agent handling (74%), with the other reasons spread across several areas including fraud and forgery, internet related, misrepresentation, etc. For Life and Health

complaints, agent handling was 34%, while suitability of products (26%) ranked second and misrepresentation was third (21%).

In many cases, policyholder services complaints reflect dissatisfaction with how a company's personnel treat their customers. Responding to coverage questions was the most prevalent complaint for Property and Casualty policies (36%), followed closely by premium refunds (36%) then premium notice or billing issues (12%). Life and Health policies had the same issues but in different order, premium refund (18.5%), with premium notice and billing (17.4%) and coverage questions (15%) following closely.

For FY2005-06, the work of the ICARE Section resulted in benefit to consumers of over \$7,220,601, mainly in claim payments, overturned denials of benefits, and reinstatements of coverage. Of the complaints closed in FY2005-06, for the Property and Casualty complaints, in 54% of the cases, the company was found to be all or partially in violation of the law or their policy provisions. For the Life and Health complaints, in 70% of the cases, the carrier was found at least partially in the wrong.

The Division of Insurance recently published its 2005 Calendar Year Complaint Ratio Report to provide consumers with information about the number of complaints and questions lodged against the various insurance companies and health carriers. A copy of this report is included as the Appendix to this report. Enhancements to this year's report include consolidation of health maintenance organizations (HMOs) into the list of health carriers, and the calculation for each company of the number and percent of complaints in which the consumer's complaint was found to have validity and the company was found at least partially in violation of Colorado law, regulation or the policy provisions. By the end of 2006, the Division of Insurance will be posting on its website an interactive version of the Complaint Ratio Report to permit consumers to search for a particular company or sort by market share, complaint ratio, or percent of confirmed complaints.

COLORADO DIVISION OF INSURANCE 2005 COMPLAINT RATIO

The 2005 consumer complaint ratios of insurance companies and health carriers illustrate how some companies generate more complaints per \$1 million of premium than others. The ratios provide helpful information to consumers interested in evaluating their insurance companies and/or health carriers, and to state regulators in targeting companies requiring closer review.

For the purposes of this report, a complaint is defined as written correspondence expressing a grievance against an insurer or carrier. In the tables below, a total complaint ratio of 4.40, for example, means the company had approximately 4.40 complaints per \$1 million worth of business. Total complaint counts are also listed, together with premium volume and market share. New this year, the report also shows the number and percentage of "confirmed complaints" in which the consumer prevailed, in whole or in part, in their complaint against the company.

The report includes companies with five (5) or more complaints or at least one tenth of a percent (.1%) of the premium volume in a particular line of insurance. In this manner, the report looks at those companies with significant numbers of complaints but also provides information on a number of insurers and carriers writing business in Colorado. Private passenger automobile protests are included in the number of complaints. Federal Employees Health Benefit Plan premiums are not included in this report as the complaints are not counted against the company.

Tables are included for lines of insurance which account for the greatest numbers of complaints and premiums written. On average, private passenger automobile insurance generates the highest complaint ratios, followed by homeowners/farmowners and health insurance. Life insurance companies have lower average complaint ratios.

Large differences can be seen among competing companies; small differences should not be considered meaningful. Complaint ratios which are based on less than \$1 million in premium are highly variable and may not be an adequate measure of a company's performance.

Consumers are cautioned against relying only on complaint ratios when evaluating companies; premiums, benefits, financial condition, and level of service should all be considered.

The Division of Insurance will also be posting an interactive version of the 2005 Complaint Ratio Report on our website, www.dora.state.co.us/insurance. This interactive version will permit search by company of the various areas and sorting by column of the information. The interactive version should be online by year-end 2006.

Please Note: The companies included in this report are responsible for reconciling documented complaints and reporting discrepancies to the Division of Insurance. However, not all of the companies have performed this review. Therefore, this report may contain unverified information.

Private Passenger Auto Insurance Complaints

	2005 Total Complaint Ratio	Total Complaints	Confirmed Complaints	% Confirmed	Premium (\$ Million)	2005 Marketshare
AIU Insurance Co.	2.41	28	16	57.1%	11.63	0.42%
Allied Property and Casualty Ins. Co.	0.89	15	9	60.0%	16.89	0.61%
Allstate Indemnity Co.	0.64	13	7	53.8%	20.47	0.74%
Allstate Insurance Co.	0.74	79	37	46.8%	107.34	3.90%
Allstate Prop. and Casualty Ins. Co.	0.64	54	22	40.7%	84.13	3.05%
Amco Insurance Co.	0.49	9	3	33.3%	18.49	0.67%
American Bankers Ins. Co. of FL	1.74	10	7	70.0%	5.73	0.21%
American Family Mutual Ins. Co.	1.16	257	104	40.5%	221.96	8.06%
American International Ins. Co.	2.54	12	7	58.3%	4.72	0.17%
American Modern Home Ins. Co.	3.81	5	1	20.0%	1.31	0.05%
American Nat'l Prop. & Casualty Co.	1.38	35	22	62.9%	25.39	0.92%
American Standard Ins. Co. of WI	0.63	42	18	42.9%	67.16	2.44%
Amex Assurance Co.	0.72	8	5	62.5%	11.19	0.41%
Amica Mutual Insurance Co.	1.37	19	4	21.1%	13.91	0.51%
Auto-Owners Insurance Co.	1.50	6	4	66.7%	4.01	0.15%
Birmingham Fire Ins. Co. of PA	0.71	2	1	50.0%	2.81	0.10%
Bristol West Insurance Co.	0.92	7	6	85.7%	7.59	0.28%
California Casualty Indemnity Exch.	1.44	20	9	45.0%	13.92	0.51%
Charter Oak Fire Insurance Co.	1.83	14	6	42.9%	7.63	0.28%
Colorado Casualty Insurance Co.	1.68	14	9	64.3%	8.31	0.30%
Colo. Farm Bureau Mutual Ins. Co.	1.06	31	19	61.3%	29.18	1.06%
Country Mutual Insurance Co.	0.82	19	12	63.2%	23.11	0.84%
Country Preferred Insurance Co.	0.30	4	2	50.0%	13.17	0.48%
Dairyland Insurance Co.	1.41	8	2	25.0%	5.67	0.21%
Deerbrook Insurance Co.	0.64	3	3	100.0%	4.72	0.17%
Depositors Insurance Co.	2.21	8	3	37.5%	3.63	0.13%
Economy Premier Assurance Co.	0.34	2	2	100.0%	5.90	0.21%
Encompass Indemnity Co.	0.64	5	2	40.0%	7.81	0.28%
Encompass Ins. Co. of America	0.32	5	4	80.0%	15.71	0.57%
Esurance Insurance Co.	0.90	13	8	61.5%	14.51	0.53%
Farmers Alliance Mutual Ins. Co.	0.85	4	2	50.0%	4.72	0.17%
Farmers Insurance Exchange	0.67	185	102	55.1%	274.55	9.97%
Federal Insurance Co.	0.33	1	1	100.0%	3.03	0.11%
Financial Indemnity Co.	1.87	19	17	89.5%	10.17	0.37%
Geico Casualty Co.	0.69	18	12	66.7%	25.95	0.94%
GEICO General Insurance Co.	1.01	43	21	48.8%	42.65	1.55%
GEICO Indemnity Co.	0.69	15	10	66.7%	21.87	0.79%
General Insurance Co. of America	1.48	12	9	75.0%	8.10	0.29%

Government Employees Ins. Co.	1.17	32	13	40.6%	27.46	1.00%
Grange Insurance Association	0.90	3	3	100.0%	3.35	0.12%
Great Northern Insurance Co.	0.55	4	3	75.0%	7.25	0.26%
Hartford Ins. Co. of the Midwest	2.14	14	8	57.1%	6.54	0.24%
Hartford Underwriters Ins. Co.	2.48	85	35	41.2%	34.26	1.24%
Illinois National Insurance Co.	2.71	21	12	57.1%	7.75	0.28%
Integon Indemnity Corporation	1.35	5	4	80.0%	3.69	0.13%
Integon National Insurance Co.	1.80	5	5	100.0%	2.77	0.10%
Liberty Mutual Fire Insurance Co.	1.13	45	28	62.2%	39.91	1.45%
Mendota Insurance Co.	2.97	31	21	67.7%	10.43	0.38%
Metropolitan Casualty Ins. Co.	1.17	7	4	57.1%	5.99	0.22%
Mid-Century Insurance Co.	0.98	104	46	44.2%	106.41	3.86%
Nat'l Farmers Union Prop. & Cas. Co.	0.67	12	8	66.7%	18.01	0.65%
National General Insurance Co.	1.23	10	5	50.0%	7.82	0.28%
Nationwide Mutual Insurance Co.	1.13	7	1	14.3%	6.22	0.23%
New Hampshire Indemnity Co., Inc.	0.76	21	17	81.0%	27.74	1.01%
Owners Insurance Co.	0.66	5	5	100.0%	7.58	0.28%
Progressive Casualty Ins. Co.	0.93	42	26	61.9%	45.40	1.65%
Progressive Direct Ins. Co.	0.54	47	27	57.4%	87.47	3.18%
Progressive Mountain Ins. Co.	0.65	3	2	66.7%	4.64	0.17%
Progressive Preferred Ins. Co.	0.29	14	11	78.6%	48.46	1.76%
Progressive Specialty Ins. Co.	1.52	16	8	50.0%	10.49	0.38%
Prop. and Cas. Ins. Co. of Hartford	1.78	52	19	36.5%	29.29	1.06%
Safeco Insurance Co. of America	1.70	74	52	70.3%	43.56	1.58%
Safeco Insurance Co. of Illinois	1.56	20	16	80.0%	12.84	0.47%
Sentinel Insurance Co., Ltd.	0.55	7	4	57.1%	12.71	0.46%
Sentry Insurance A Mutual Co.	2.36	8	5	62.5%	3.38	0.12%
Shelter Mutual Insurance Co.	0.46	10	8	80.0%	21.83	0.79%
Standard Fire Insurance Co.	1.75	12	5	41.7%	6.86	0.25%
State Farm Fire and Casualty Co.	1.21	49	19	38.8%	40.63	1.48%
State Farm Mutual Automobile Ins. Co.	0.46	251	122	48.6%	545.74	19.81%
Teachers Insurance Co.	1.40	8	5	62.5%	5.73	0.21%
Titan Indemnity Co.	1.31	14	9	64.3%	10.66	0.39%
Travelers Indemnity Co. of America	4.75	25	12	48.0%	5.27	0.19%
Travelers Prop. Cas. Co. of America	1.85	15	10	66.7%	8.11	0.29%
Trinity Universal Insurance Co.	3.27	5	4	80.0%	1.53	0.06%
Trinity Universal Ins. Co. of KS, Inc.	0.22	1	0	0.0%	4.56	0.17%
United Services Automobile Assn.	1.41	140	49	35.0%	99.38	3.61%
Unitrin Auto and Home Ins. Co.	1.93	15	11	73.3%	7.78	0.28%
Unitrin Direct Prop. & Casualty Co.	1.64	5	4	80.0%	3.04	0.11%

USAA Casualty Insurance Co.	1.12	94	35	37.2%	83.63	3.04%
USAA General Indemnity Co.	0.92	5	1	20.0%	5.45	0.20%
Victoria Fire & Casualty Co.	0.72	2	1	50.0%	2.77	0.10%
Viking Insurance Co. of WI	1.23	39	33	84.6%	31.62	1.15%
Western United Insurance Co.	1.27	8	5	62.5%	6.32	0.23%
Young America Insurance Co.	0.53	10	6	60.0%	18.70	0.68%

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Health Complaints

(includes HMO, Accident, Dental and Prepaid Dental Companies)

<i>(HMOs and Prepaid Dental Companies appear in bolded italics.)</i>	2005 Total Complaint Ratio	Total Complaints	Confirmed Complaints	% Confirmed	Premium (\$ Million)	2005 Marketshare
<i>Aetna Health Inc.</i>	0.08	8	8	100.0%	95.33	1.62%
Aetna Life Insurance Co.	0.15	11	8	72.7%	73.82	1.25%
AFLAC of Columbus	0.11	4	3	75.0%	36.21	0.61%
American Family Mutual Ins. Co.	0.11	1	1	100.0%	8.99	0.15%
American Fidelity Assurance Co.	0.12	1	1	100.0%	8.20	0.14%
American Med. Security Life Ins. Co.	0.31	4	2	50.0%	12.84	0.22%
American Republic Insurance Co.	0.25	5	2	40.0%	19.84	0.34%
Anthem Blue Cross Blue Shield	0.20	101	71	70.3%	507.31	8.61%
Bankers Life and Casualty Co.	0.45	8	4	50.0%	17.61	0.30%
Celtic Insurance Co.	2.34	8	5	62.5%	3.42	0.06%
<i>CIGNA Dental Health of CO, Inc.</i>	0.11	1	1	100.0%	9.24	0.16%
<i>CIGNA Healthcare of CO, Inc.</i>	0.18	23	16	69.6%	129.54	2.20%
<i>CO Choice Health Plans ¹</i>	0.07	1	1	100.0%	14.39	0.24%
Colonial Life & Accident Ins. Co.	0.31	2	2	100.0%	6.48	0.11%
Combined Ins. Co. of America	0.09	1	0	0.0%	11.59	0.20%
Companion Life Insurance Co.	0.12	1	1	100.0%	8.62	0.15%
Connecticut General Life Ins. Co.	0.07	10	7	70.0%	135.24	2.30%
Conseco Senior Health Ins. Co.	3.88	12	7	58.3%	3.09	0.05%
Continental Casualty Co.	0.27	3	3	100.0%	11.21	0.19%
Delta Dental Plan of CO, Inc.	0.03	3	3	100.0%	97.25	1.65%
Empire Fire and Marine Ins. Co.	1.45	11	6	54.5%	7.60	0.13%
Equitable Life & Casualty Ins. Co.	0.29	3	1	33.3%	10.41	0.18%
Genworth Life Insurance Co.	0.10	3	3	100.0%	30.30	0.51%
Golden Rule Insurance Co.	0.40	20	13	65.0%	50.34	0.85%
<i>Great-West Healthcare of CO, Inc.</i>	0.09	3	2	66.7%	32.33	0.55%
Guardian Life Ins. Co. of America	0.32	22	17	77.3%	67.85	1.15%
Hartford Life and Accident Ins. Co.	0.06	2	2	100.0%	35.82	0.61%
<i>HMO Colorado, Inc.</i>	0.06	10	8	80.0%	172.65	2.93%
Humana Insurance Co.	0.32	37	27	73.0%	115.66	1.96%
John Alden Life Insurance Co.	0.55	4	2	50.0%	7.21	0.12%
John Hancock Life Insurance Co.	0.26	5	4	80.0%	19.25	0.33%
<i>Kaiser Foundation Health Plan of CO</i>	0.04	64	48	75.0%	1470.41	24.96%
Kaiser Permanente Insurance Co.	0.26	4	3	75.0%	15.67	0.27%
Life Insurance Co. of North America	0.23	3	2	66.7%	12.96	0.22%
Life Investors Ins. Co. of America	0.47	8	5	62.5%	16.89	0.29%
MEGA Life and Health Ins. Co.	0.51	22	16	72.7%	43.38	0.74%
Metropolitan Life Insurance Co.	0.05	3	1	33.3%	59.45	1.01%

Mid-West National Life Ins. Co. of TN	1.02	16	9	56.3%	15.71	0.27%
Mutual of Omaha Insurance Co.	0.12	3	1	33.3%	24.82	0.42%
National Foundation Life Ins. Co.	0.14	1	0	0.0%	6.91	0.12%
New England Life Insurance Co.	0.21	2	2	100.0%	9.67	0.16%
Pacific Life & Annuity Co.	0.93	13	10	76.9%	14.05	0.24%
PacifiCare Life Assurance Co.	0.25	38	33	86.8%	154.99	2.63%
PacifiCare of CO, Inc.	0.06	54	33	61.1%	865.93	14.70%
Paul Revere Life Insurance Co.	0.17	1	0	0.0%	5.93	0.10%
Physicians Mutual Insurance Co.	0.12	1	0	0.0%	8.42	0.14%
Principal Life Insurance Co.	0.20	7	2	28.6%	35.66	0.61%
Provident Life and Accident Ins. Co.	0.09	1	1	100.0%	11.05	0.19%
Prudential Insurance Co. of America	0.30	3	2	66.7%	9.98	0.17%
ReliaStar Life Insurance Co.	0.27	2	1	50.0%	7.28	0.12%
Rocky Mtn. Healthcare Options, Inc.	0.05	5	3	60.0%	99.31	1.69%
Rocky Mountain HMO, Inc.	0.09	17	10	58.8%	189.92	3.22%
Standard Insurance Co.	0.20	8	3	37.5%	40.56	0.69%
State Farm Mutual Auto. Ins. Co.	0.05	2	2	100.0%	36.37	0.62%
Stonebridge Life Insurance Co.	0.33	2	1	50.0%	6.04	0.10%
Symetra Life Insurance Co.	0.13	1	1	100.0%	7.78	0.13%
Thrivent Financial for Lutherans	0.13	1	1	100.0%	7.57	0.13%
Time Insurance Co.	0.86	67	49	73.1%	78.22	1.33%
Travelers Insurance Co.	4.33	11	2	18.2%	2.54	0.04%
Unicare Life & Health Ins. Co.	0.41	3	3	100.0%	7.34	0.12%
Union Fidelity Life Insurance Co.	2.38	5	4	80.0%	2.10	0.04%
Union Security Insurance Co.	0.18	3	1	33.3%	16.78	0.28%
United American Insurance Co.	1.43	11	8	72.7%	7.69	0.13%
United Healthcare Insurance Co.	0.14	89	72	80.9%	649.61	11.03%
United Healthcare of CO, Inc.	0.13	10	8	80.0%	75.38	1.28%
U.S. Life Ins. Co. in the City of NY	0.47	4	3	75.0%	8.56	0.15%
Unum Life Ins. Co. of America	0.22	7	6	85.7%	31.72	0.54%
World Insurance Co.	0.63	6	2	33.3%	9.46	0.16%

¹ Name changed from San Luis Valley HMO

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Homeowners and Farmowners Insurance Complaints

	2005 Total Complaint Ratio	Total Complaints	Confirmed Complaints	% Confirmed	Premium (\$ Million)	2005 Marketshare
Allied Property and Casualty Ins. Co.	0.86	9	6	66.7%	10.41	0.94%
Allstate Indemnity Co.	0.26	5	3	60.0%	19.20	1.74%
Allstate Insurance Co.	0.80	41	23	56.1%	51.00	4.61%
Allstate Prop. and Casualty Ins. Co.	0.20	6	4	66.7%	29.85	2.70%
Amco Insurance Co.	0.56	7	7	100.0%	12.51	1.13%
American Family Mutual Ins. Co.	0.25	39	28	71.8%	155.30	14.04%
American International Ins. Co.	0.15	1	1	100.0%	6.81	0.62%
American Modern Home Ins. Co.	39.29	5	4	80.0%	0.13	0.01%
American Nat'l Prop. & Casualty Co.	0.47	6	3	50.0%	12.72	1.15%
Amex Assurance Co.	0.56	2	2	100.0%	3.55	0.32%
Amica Mutual Insurance Co.	0.30	2	2	100.0%	6.63	0.60%
Automobile Ins. Co. of Hartford CT	1.08	3	3	100.0%	2.78	0.25%
Auto-Owners Insurance Co.	0.37	1	1	100.0%	2.67	0.24%
Balboa Insurance Co.	0.67	4	4	100.0%	5.96	0.54%
Colorado Casualty Insurance Co.	0.82	8	4	50.0%	9.73	0.88%
Colo. Farm Bureau Mutual Ins. Co.	0.52	12	6	50.0%	22.88	2.07%
Country Mutual Insurance Co.	0.94	15	8	53.3%	15.98	1.44%
Depositors Insurance Co.	0.63	1	0	0.0%	1.59	0.14%
Empire Fire and Marine Ins. Co.	0.53	1	0	0.0%	1.90	0.17%
Encompass Ins. Co. of America	0.59	5	5	100.0%	8.50	0.77%
Farmers Alliance Mutual Ins. Co.	0.69	4	2	50.0%	5.83	0.53%
Farmers Insurance Exchange	0.95	2	2	100.0%	2.11	0.19%
Federal Insurance Co.	0.12	1	0	0.0%	8.35	0.76%
Fidelity Nat'l Prop. & Cas. Ins. Co.	0.80	2	1	50.0%	2.50	0.23%
Fire Insurance Exchange	0.49	77	60	77.9%	156.55	14.15%
Fireman's Fund Insurance Co.	0.44	1	0	0.0%	2.29	0.21%
Foremost Ins. Co. Grand Rapids, MI	0.72	8	5	62.5%	11.17	1.01%
Foremost Prop. & Casualty Ins. Co.	1.69	2	1	50.0%	1.18	0.11%
Grange Insurance Association	1.12	5	5	100.0%	4.48	0.41%
Great Northern Insurance Co.	0.12	3	2	66.7%	25.08	2.27%
GuideOne Mutual Insurance Co.	1.86	2	2	100.0%	1.08	0.10%
Hartford Ins. Co. of the Midwest	0.37	1	0	0.0%	2.71	0.25%
Hartford Underwriters Ins. Co.	0.21	3	2	66.7%	14.19	1.28%
Homesite Indemnity Co.	1.50	5	2	40.0%	3.34	0.30%
Indemnity Ins. Co. of No. America	1.04	2	2	100.0%	1.92	0.17%
Liberty Mutual Fire Ins. Co.	0.47	8	7	87.5%	16.85	1.52%
Nat'l Farmers Union Prop. & Cas. Co.	0.50	6	4	66.7%	11.94	1.08%
Nationwide Mutual Fire Ins. Co.	0.51	1	0	0.0%	1.97	0.18%

Owners Insurance Co.	0.15	1	1	100.0%	6.87	0.62%
Prop. and Cas. Ins. Co. of Hartford	0.42	5	4	80.0%	11.77	1.06%
Safeco Insurance Co. of America	0.71	14	6	42.9%	19.62	1.77%
Sentinel Insurance Co., Ltd.	0.34	3	3	100.0%	8.82	0.80%
Shelter Mutual Insurance Co.	0.42	5	3	60.0%	11.94	1.08%
Standard Fire Insurance Co.	0.33	11	9	81.8%	33.73	3.05%
State Farm Fire and Casualty Co.	0.20	53	37	69.8%	271.13	24.51%
Travelers Indemnity Co. of America	0.83	4	4	100.0%	4.81	0.43%
Travelers Indemnity Co.	2.22	3	1	33.3%	1.35	0.12%
Twin City Fire Insurance Co.	0.52	1	1	100.0%	1.92	0.17%
Union Ins. Co. of Providence	0.67	1	1	100.0%	1.49	0.14%
United Services Automobile Assn.	0.05	2	2	100.0%	43.57	3.94%
Unitrin Auto and Home Ins. Co.	1.22	4	2	50.0%	3.29	0.30%
USAA Casualty Insurance Co.	0.14	4	4	100.0%	27.66	2.50%
West American Insurance Co.	0.36	1	1	100.0%	2.80	0.25%

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Life Insurance and Annuity Complaints

	2005 Total Complaint Ratio	Total Complaints	Confirmed Complaints	% Confirmed	Premium (\$ Million)	2005 Marketshare
Allianz Life Ins. Co. of No. America	1.74	7	6	85.7%	4.02	0.31%
Allmerica Fin. Life Ins. & Ann. Co.	0.17	1	1	100.0%	5.82	0.45%
Allstate Life Insurance Co.	0.16	2	0	0.0%	12.41	0.96%
American Family Life Ins. Co.	0.08	2	2	100.0%	24.65	1.92%
American General Life Ins. Co.	0.12	5	3	60.0%	40.14	3.12%
American Income Life Ins. Co.	0.41	2	1	50.0%	4.93	0.38%
American Memorial Life Ins. Co.	0.53	2	2	100.0%	3.80	0.30%
American National Ins. Co.	0.33	3	2	66.7%	9.07	0.71%
Ameritas Variable Life Ins. Co.	0.30	1	1	100.0%	3.36	0.26%
AmerUs Life Insurance Co.	0.11	1	1	100.0%	9.24	0.72%
Assurity Life Insurance Co.	0.55	1	1	100.0%	1.80	0.14%
AXA Equitable Life Ins. Co.	0.12	3	2	66.7%	25.02	1.94%
Bankers Life and Casualty Co.	1.66	3	2	66.7%	1.81	0.14%
Banner Life Insurance Co.	0.18	1	0	0.0%	5.61	0.44%
Chase Insurance Life Co.	0.26	1	1	100.0%	3.87	0.30%
Conseco Life Insurance Co.	2.34	11	7	63.6%	4.71	0.37%
Continental Assurance Co.	0.73	1	1	100.0%	1.38	0.11%
CUNA Mutual Ins. Society	0.15	1	1	100.0%	6.55	0.51%
Farmers New World Life Ins. Co.	0.10	3	2	66.7%	30.36	2.36%
Fidelity and Guaranty Life Ins. Co.	0.45	4	4	100.0%	8.96	0.70%
First Colony Life Insurance Co.	0.08	2	2	100.0%	24.07	1.87%
Globe Life and Accident Ins. Co.	0.40	2	2	100.0%	5.00	0.39%
Great-West Life & Annuity Ins. Co.	0.09	1	1	100.0%	10.69	0.83%
Guardian Life Ins. Co. of America	0.04	1	0	0.0%	25.50	1.98%
Hartford Life and Accident Ins. Co.	0.05	1	0	0.0%	20.35	1.58%
Hartford Life and Annuity Ins. Co.	0.03	1	0	0.0%	30.10	2.34%
Hartford Life Insurance Co.	0.17	2	2	100.0%	11.47	0.89%
IDS Life Insurance Co.	0.09	1	1	100.0%	11.63	0.90%
Jackson National Life Ins. Co.	0.32	3	1	33.3%	9.50	0.74%
Jefferson Pilot Financial Ins. Co.	0.18	3	2	66.7%	17.08	1.33%
Jefferson Pilot Life Ins. Co.	0.11	1	1	100.0%	9.33	0.73%
John Hancock Life Ins. Co.	0.66	2	2	100.0%	3.04	0.24%
Life Ins. Co. of North America	0.07	1	1	100.0%	13.50	1.05%
Life Ins. Co. of the Southwest	0.22	1	0	0.0%	4.63	0.36%
Lincoln Benefit Life Co.	0.06	1	0	0.0%	17.00	1.32%
Lincoln Heritage Life Ins. Co.	0.75	1	0	0.0%	1.34	0.10%
Massachusetts Mutual Life Ins. Co.	0.03	1	1	100.0%	29.85	2.32%
Metropolitan Life Ins. Co.	0.11	7	6	85.7%	64.11	4.98%

Midland National Life Ins. Co.	0.07	1	1	100.0%	14.14	1.10%
Minnesota Life Ins. Co.	0.18	3	3	100.0%	16.89	1.31%
Monumental Life Ins. Co.	0.21	1	1	100.0%	4.67	0.36%
Nationwide Life Ins. Co.	0.17	2	1	50.0%	11.88	0.92%
New England Life Ins. Co.	0.13	2	1	50.0%	15.53	1.21%
New York Life Ins. & Annuity Corp.	0.03	1	1	100.0%	31.33	2.44%
New York Life Insurance Co.	0.03	2	2	100.0%	60.28	4.69%
Northwestern Mutual Life Ins. Co.	0.01	2	2	100.0%	137.73	10.71%
Ohio National Life Ins. Co.	0.21	1	0	0.0%	4.85	0.38%
Pacific Life Insurance Co.	0.02	1	0	0.0%	42.58	3.31%
Phoenix Life Insurance Co.	0.30	2	1	50.0%	6.62	0.51%
Primerica Life Insurance Co.	0.05	1	1	100.0%	19.38	1.51%
Protective Life Insurance Co.	0.17	2	2	100.0%	11.93	0.93%
Pruco Life Insurance Co.	0.07	1	1	100.0%	13.83	1.08%
Prudential Ins. Co. of America	0.12	9	8	88.9%	73.15	5.69%
Reassure America Life Ins. Co.	0.56	3	2	66.7%	5.38	0.42%
ReliaStar Life Insurance Co.	0.08	2	2	100.0%	24.69	1.92%
Security Financial Life Ins. Co.	0.27	1	1	100.0%	3.73	0.29%
Security Life of Denver Ins. Co.	0.09	4	3	75.0%	46.69	3.63%
Standard Insurance Co.	0.04	1	1	100.0%	24.66	1.92%
State Farm Life Insurance Co.	0.03	2	1	50.0%	63.25	4.92%
Stonebridge Life Insurance Co.	0.82	2	2	100.0%	2.45	0.19%
Symetra Life Insurance Co.	0.28	1	0	0.0%	3.61	0.28%
Thrivent Financial for Lutherans	0.08	2	1	50.0%	25.58	1.99%
Transamerica Occid. Life Ins. Co.	0.06	2	2	100.0%	35.75	2.78%
Travelers Insurance Co.	0.61	2	1	50.0%	3.30	0.26%
U.S. Financial Life Ins. Co.	0.19	1	0	0.0%	5.25	0.41%
Union Security Ins. Co.	0.23	2	2	100.0%	8.70	0.68%
Union Security Life Ins. Co.	0.91	2	0	0.0%	2.19	0.17%
United of Omaha Life Ins. Co.	0.14	3	2	66.7%	21.21	1.65%
Valley Forge Life Ins. Co.	0.15	2	1	50.0%	13.60	1.06%
Washington National Ins. Co.	10.81	6	5	83.3%	0.55	0.04%

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