

James M. Olsen
VP, Accounting and Investment Policy

February 10, 2012

Mr. Robert E. Feldman, Executive Secretary
Attentions: Comments
Federal Deposit Insurance Corporation
550 17th Street NW.
Washington, DC 20429

Re: Mutual Insurance Holding Company Treated as Insurance Company
RIN 3064-AD89

Dear Mr. Feldman:

The Property Casualty Insurers Association of America (PCI) welcomes the opportunity to respond to the Notice of Proposed Rulemaking regarding the above referenced topic. PCI's more than 1000 member insurance companies write over \$180 billion in annual premium, which represents more than 38 percent of the property casualty insurance coverage written in the United States.

We recognize and appreciate the FDIC's efforts to address the expressed recognition of Congress that it is appropriate to treat all insurance companies, including mutual insurance holding companies, alike for purposes of the Orderly Liquidation Authority created under the Dodd-Frank Wall Street Reform and Consumer Protection Act. The FDIC has already been made aware of the substantial legislative record indicating a clear congressional intent that mutual insurance holding companies be considered as insurance companies for purposes of the FDIC's Orderly Liquidation Authority. The proposed rule sets forth reasonable definitions that will ensure that mutual insurance holding companies will be resolved by state insurance regulators as will be the case for insurance companies generally. We therefore support the adoption of the proposed rule.

If you have any question about our letter, please contact me at your convenience.

Sincerely,



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