



Arkansas  
**BlueCross BlueShield**  
An Independent Licensee of the Blue Cross and Blue Shield Association

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November 11, 2015

The Honorable Amanda Capps Rose  
Associate Counsel  
Arkansas Insurance Department  
1200 West Third Street  
Little Rock, Arkansas 72201-1904

Re: Proposed Amended Rule 15: “Insurance Holding Company  
Systems with Reporting Forms and Instructions”

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Dear Ms. Rose:

In response to the notice of public hearing issued by the Arkansas Insurance Department on October 12, 2015 in connection with the proposed Amended Rule 15: “Insurance Holding Company Systems with Reporting Forms and Instructions,” I am writing to provide comments on behalf of Arkansas Blue Cross and Blue Shield.

Generally, we understand and support the Department’s decision to amend Arkansas Insurance Department Rule 15 to adopt the provisions of the NAIC Insurance Company System Model Regulation as published in January 2011.

However, in adopting the NAIC model, it appears that the Department has inadvertently deleted the provision in the current Rule 15 that allows the submission of paper statements required by the Insurance Holding Company Regulatory Act. Subsection 5(c) of the proposed rule does not contain the following language that is in the current rule:

Statements should be prepared on paper 8 ½” x 11” in size and preferably bound at the top or the top left-hand corner. Exhibits and financial statements, unless specifically prepared for the filing, may be submitted in their original size. All copies of any statement, financial statements, or exhibits shall be clear, easily readable and suitable for photocopying. Debits in credit categories and credits in debit categories shall be designated so as to be clearly distinguishable as such on photocopies.”

The Honorable Amanda Capps Rose  
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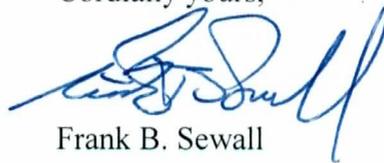
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Instead, Subsection 5(c) of the proposed rule only provides: "Statements should be prepared electronically. Statements shall be easily readable and suitable for review and reproduction."

We recommend that Subsection 5(c) of the proposed rule be amended to allow for the submission of statements in either paper or electronic form.

Ms. Rose, please let me know if you have any questions concerning my comments. I plan to be present at the hearing on November 12, 2015 at 1:00 P.M.

Cordially yours,

A handwritten signature in blue ink, appearing to read "Frank B. Sewall", written in a cursive style.

Frank B. Sewall

FBS:add