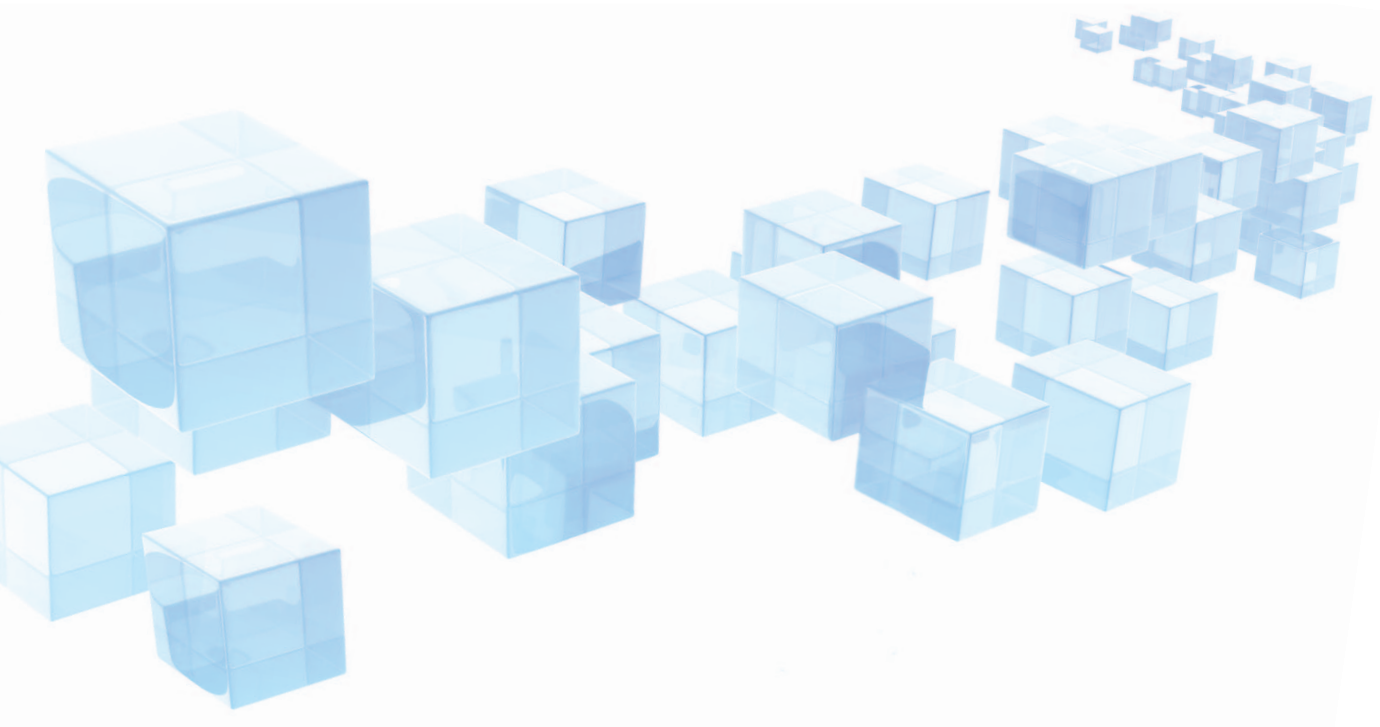


# The Treatment of Terrorism Risk in the Rating Evaluation

October 13, 2017



# The Treatment of Terrorism Risk in the Rating Evaluation

## Outline

- A. Market Overview
- B. Balance Sheet Strength
- C. Enterprise Risk Management (ERM)

The following criteria procedure should be read in conjunction with *Best's Credit Rating Methodology (BCRM)* and all other related BCRM-associated criteria procedures. The BCRM provides a comprehensive explanation of AM Best Rating Services' rating process.

## A. Market Overview

Terrorist attacks can vary from small, conventional weapons attacks with limited insured losses to full-scale nuclear attacks with devastating impacts on insurers' resources. For exposures located in the United States, the passage of the Terrorism Risk Insurance Program Reauthorization Act of 2015 (TRIPRA) extended the federal backstop six years and temporarily reduced AM Best's concerns about the US government's long-term commitment to a federal role. However, since TRIPRA is designed to increase the insurance industry's exposure over time and will expire in December 2020, it is extremely important that insurers themselves are properly managing their exposure to terrorism risk.

Moreover, the current version of TRIPRA was approved based upon cost estimates provided by the Congressional Budget Office using expected losses that result in a recoupment of the federal share, making TRIPRA appear to have no impact on the deficit. However, should the actual industry losses be greater than expected and large enough to prevent any federal recoupment, the Treasury would have to provide as much as \$60 billion in a short time, which would increase the deficit. Although it is highly unlikely that no payments would be made to insurers, the possibility still exists, and a reduced payment certainly is possible. Furthermore, any lengthy delays in receiving the funds from the Treasury while the government decides on a course of action could cause liquidity problems for the insurer. Thus, although a federal backstop can help reduce the impact of terrorism losses, reliance on such a mechanism cannot replace an insurer's own management of its terrorism risk.

Despite the complexities in identifying, monitoring, quantifying, and managing terrorism risks, AM Best believes that any insurer with a material exposure to terrorism risk should be conducting its own terrorism-related stress testing. Additionally, an insurer should be able to quantify the impact an attack could have on its financial position. AM Best has also developed terrorism-related stress scenarios that are part of the balance sheet strength assessment. This criteria procedure addresses how AM Best uses these scenarios when evaluating an insurer's balance sheet strength. It also gives further guidance on the elements related to terrorism risk management that AM Best expects an insurer to incorporate into its enterprise risk management (ERM) program.



# The Treatment of Terrorism Risk in the Rating Evaluation

## B. Balance Sheet Strength

### Primary Insurers and BCAR

For insurers with material exposures to terrorism loss, AM Best's key concerns are:

- Aggregate exposure to terrorism
- Number of insured locations
- Geographic concentration of insured exposures
- Impact on capitalization
- Uncertainty surrounding the government's long-term commitment to a federal backstop

Accordingly, AM Best determines a terrorism risk amount, which may be added to required capital in its Best's Capital Adequacy Ratio (BCAR) model. This risk amount reflects the following:

- Probability of a large-scale attack
- Location of the attack
- Number of large exposure concentrations
- Size of the exposures
- Level of detail in the coding of exposures
- Offsets to the direct loss

These offsets include recoveries from reinsurance and protection from any federal backstops. For US exposures, AM Best uses the recovery from TRIPRA. At each confidence interval, the terrorism risk amount is compared with the insurer's natural catastrophe probable maximum loss (PML). The larger of these (at each confidence interval) is added to required capital within the BCAR model as B8 potential catastrophe losses to calculate the insurer's standard BCAR scores. **Exhibit B.1** details a reasonable guide to standard BCAR scores and their associated assessments.

#### Exhibit B.1: BCAR Assessments

VaR Confidence Level (%)	BCAR	BCAR Assessment
99.6	> 25 at 99.6	Strongest
99.6	> 10 at 99.6 & ≤ 25 at 99.6	Very Strong
99.5	> 0 at 99.5 & ≤ 10 at 99.6	Strong
99	> 0 at 99 & ≤ 0 at 99.5	Adequate
95	> 0 at 95 & ≤ 0 at 99	Weak
95	≤ 0 at 95	Very Weak

# The Treatment of Terrorism Risk in the Rating Evaluation

## **Calculating the Terrorism Risk Amount**

To calculate the terrorism risk amount, AM Best assumes a 10% annual probability of a large-scale attack that is at least the size of a five- to six-ton TNT truck bomb and assumes a maximum of only one large-scale attack per year.

AM Best has created three tiers that reflect the level of perceived risk of attack for US cities. Tier 1 is composed of five target cities, while Tier 2 has 21 target cities. All other locations are in Tier 3. **Appendix 1** shows the cities in each tier. AM Best assigns these tiers the conditional probabilities outlined in **Exhibit B.2**.

### **Exhibit B.2: Conditional Probabilities**

Tier	Conditional Probability
1	60%
2	30%
3	10%
<b>Total</b>	<b>100%</b>

Multiplying the annual probability of a large attack by the conditional probability that the attack occurs in a given tier yields the table of annual probabilities that a large attack will occur in each of the tiers (**Exhibit B.3**).

### **Exhibit B.3: Annual Probabilities**

Tier	Annual Probability
1	6%
2	3%
3	1%
<b>Total</b>	<b>10%</b>

For US companies, using the information gathered in the terrorism section of the Supplemental Rating Questionnaire (SRQ), AM Best multiplies the annual probability by the number of exposures greater than 10% of surplus (net of reinsurance and TRIPRA) for each tier, up to a maximum of 100% in any single tier. This calculation reflects the greater risk a company insuring more locations in a given tier undertakes as compared to a company insuring fewer locations in a given tier, as well as, the greater risk assumed by a company insuring locations in a higher risk city as compared to a company insuring locations in a lower risk city. AM Best does not use the probabilities associated with individual locations provided by the terrorism models, because these extremely low individual location probabilities render expected losses too low to reasonably evaluate an insurer's balance sheet strength.

The probability (adjusted for the number and location of exposures) calculated for each tier is then multiplied by the largest exposure (net of reinsurance and TRIPRA) in each tier. For each confidence

## The Treatment of Terrorism Risk in the Rating Evaluation

level, the largest of the three terrorism risk amounts is compared with the natural catastrophe PML. If the terrorism amount is larger, it replaces the natural catastrophe PML B8 in the standard BCAR.

A sample of this calculation for the standard BCAR for US primary insurers is shown in **Appendix 2**, using the deterministic scenario and modeled loss estimates provided in the SRQ. In this example, the insurer's largest terrorism risk amount is greater than its natural catastrophe PML at the 95 and 99 confidence levels. However, its terrorism risk amount is less than its natural catastrophe PML at the 99.5 and 99.6 confidence levels. Thus, the terrorism risk amount is used as B8 at the 95 and 99 confidence levels, while the respective natural catastrophe PML amounts are used at the 99.5 and 99.6. A similar analysis is done for insurers that do not use a terrorism model by using the maximum foreseeable loss (MFL) accumulation responses provided in the SRQ.

This approach takes into consideration the probability of a large-scale attack, the location of the attack, the number of large exposure concentrations, the size of the exposures, the level of detail in the coding of exposures, the offsets to the direct loss, and the importance relative to other potential catastrophes.

### Data Quality Surcharge

During the calculation of the terrorism risk amount, AM Best makes an adjustment to the terrorism loss estimates submitted in the SRQ based upon the quality of the data used in the SRQ responses. Data quality is of paramount importance when evaluating the results of any model. AM Best adds a surcharge to the loss estimates used in the terror risk amount based upon the level of exposures geocoded to street-address level of detail. The lower the percentage of exposures coded to the street-address level, the higher the surcharge applied to the loss estimates.

The surcharges are shown in **Exhibit B.4** and are applied giving consideration for the company's deductible and co-participation under TRIPRA.

#### Exhibit B.4: Data Quality Surcharges

% Geocoded to Street Address	Surcharge
<50%	50%
50% - 59%	40%
60% - 69%	30%
70% - 79%	20%
80% - 89%	10%
90% - 100%	0%

Some insurers have made a strong effort to geocode their exposures to street-address level in certain geographic areas that contain their largest exposures, but they have not made the same effort for exposures in other geographic areas. The percentages for the level of geocoding are expected to be provided on a countrywide basis. To the extent that the insurer can demonstrate there are no large exposure concentrations outside of the rigorously geocoded area, the surcharges can be reduced by



## The Treatment of Terrorism Risk in the Rating Evaluation

---

the analyst. Insurers should be prepared to discuss their plans to improve the quality of the data in geographic areas that are missing geocoded addresses, insured values, or employee data, since these missing data could have a negative impact on the rating analysis. For those insurers that do not provide the percentage of exposures geocoded to street-address level, the analysts will apply the maximum surcharge.

### **Stress Test for Primary Insurers**

This stress test is designed to quantify the impact that a large, insured terrorism loss could have on a primary insurer's capitalization if protection from a federal backstop were not available. Thus, greater emphasis will be placed on the stress test results as the expiration date of the federal backstop approaches. Within the stress test, AM Best evaluates the largest exposures individually, using the modeled losses generated from a deterministic scenario. AM Best has selected a five- to six-ton TNT truck bomb attack as the scenario to generate the modeled losses at each concentration of exposures.

This attack scenario was selected because of its ability to create an amount of damage and insured losses large enough to stress an insurer's balance sheet. For companies without modeling capabilities, AM Best applies a factor to the largest aggregate exposures individually to reflect the extent of expected loss based on whether the location is a single structure, campus-style location, or other type of structure.

The terrorism losses are calculated net of reinsurance only and the resulting amount is reduced for any federal tax impact. Additionally, within the terrorism stress test, the following steps are applied:

1. The reported surplus is reduced by the terrorism net post-tax loss;
2. A minimum of 40% of the pre-tax ceded terrorism losses are added to the existing recoverables on the credit risk page;
3. The risk charges for the recoverables are based upon the reinsurers' current financial strength ratings; and
4. 40% of the net pre-tax terror loss is added to the loss-reserve page. This amount may be adjusted based upon the reinsurance structure.
5. The natural catastrophe per-occurrence all-perils combined net pre-tax PMLs (including reinstatement premiums) are used as an addition to required capital at each confidence level for the B8 catastrophe risk component.

**Note:** The reduction to surplus in Step 1 is on a post-tax basis only if the analyst believes that the company will be able to utilize the tax benefit. Otherwise the calculation is on a pre-tax basis.

The stress BCAR provides a view of the insurer's capitalization shortly after the terrorism event is assumed to have occurred. The extent of the BCAR's decline indicates the potential exposure to the insurer's capitalization if the federal backstop were not available.

Because these adjustments only look at the worst case, AM Best also considers how many areas of concentration an insurer has, as well as the geographic locations of these concentrations. Insurance

## The Treatment of Terrorism Risk in the Rating Evaluation

companies with more concentrations in excess of 20% of surplus prior to any recoveries from a federal backstop are at a greater risk than companies with fewer such concentrations. Companies that have large concentrations in high-risk cities also have a greater risk of loss than companies that only write in remote locations. For concentrated companies, AM Best has less tolerance for a difference between an insurer's standard and stress BCAR. As part of the terrorism stress test assessment, all companies are subject to three concentration checks. These checks examine the number of exposures with pre-tax net losses greater than 20% of policyholder surplus (PHS) a company has in specific locations: (1) countrywide, (2) Tier 1 and Tier 2 cities, and (3) Tier 1 cities only. **Exhibit B.5** outlines AM Best's tolerances for the concentration checks. An insurer must pass all three checks in order to be afforded stressed BCAR tolerance.

### Exhibit B.5: Concentration Checks

Countrywide Concentrations	Tier 1 + Tier 2 Concentrations	Tier 1 Only
Fewer than 10 Areas of Concentrated Pre-Tax Net Losses Greater than 20% of PHS	Fewer than 6 Areas of Concentrated Pre-Tax Net Losses Greater than 20% of PHS	Fewer than 3 Areas of Concentrated Pre-Tax Net Losses Greater than 20% of PHS

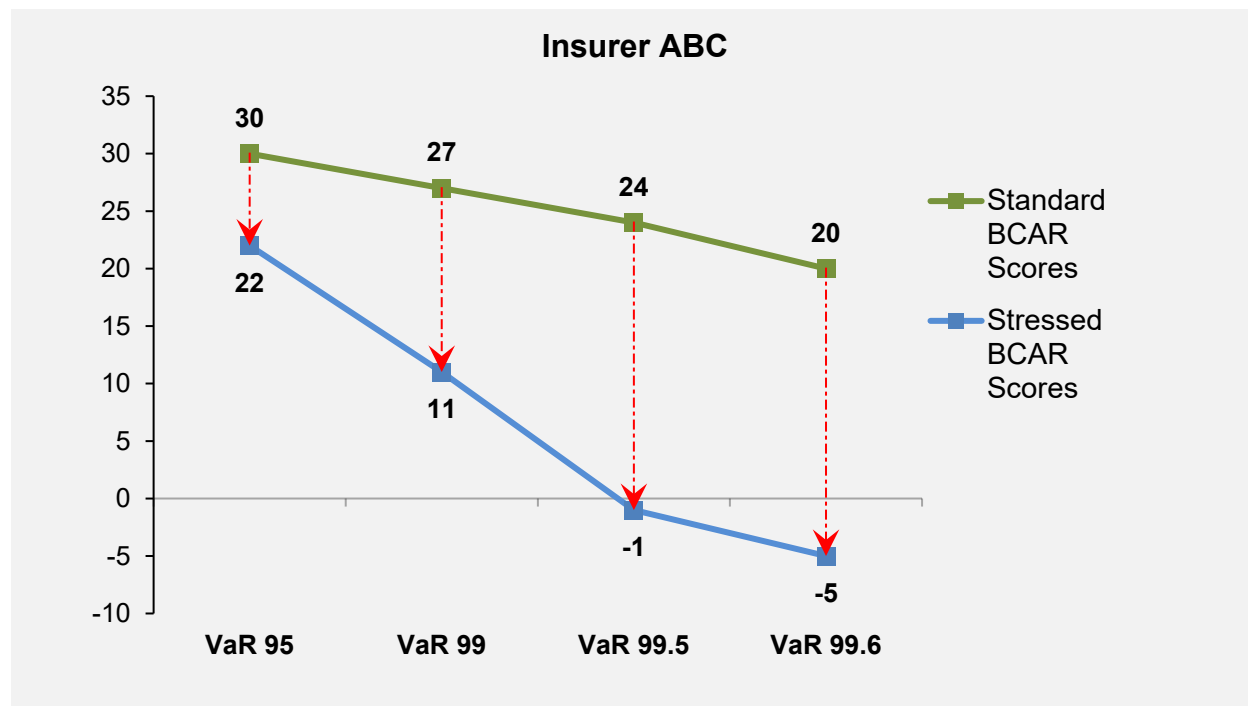
**Exhibit B.6** describes AM Best's tolerances for a decline in BCAR. AM Best only affords the tolerance outlined in **Exhibit B.6** if the insurer under evaluation passes all three of the listed concentration checks and has financial flexibility.

### Exhibit B.6: Terrorism Stress Test Tolerances (Assuming Financial Flexibility)

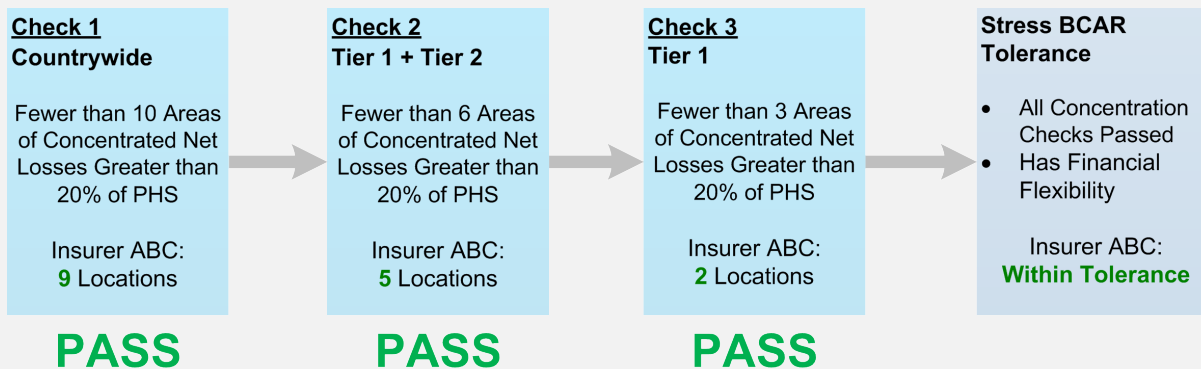
Passes All Concentration Checks	Standard BCAR Assessment	Stressed BCAR Tolerance	Revised BCAR Assessment
Yes	Strongest > 25 at 99.6	> 0 at 99.5	= Strongest
Yes	Very Strong > 10 at 99.6 & ≤ 25 at 99.6	> 0 at 99	= Very Strong
Yes	Strong > 0 at 99.5 & ≤ 10 at 99.6	> 0 at 95	= Strong
Yes	Adequate > 0 at 99 & ≤ 0 at 99.5	> 0 at 95	= Adequate
Yes	Adequate > 0 at 99 & ≤ 0 at 99.5	≤ 0 at 95	= Weak
Yes	Weak > 0 at 95 & ≤ 0 at 99	≤ 0 at 95	= Very Weak

# The Treatment of Terrorism Risk in the Rating Evaluation

Exhibit B.7: Example of Insurer with Financial Flexibility Passing the Terror Stress Test



With a standard BCAR score of 20 at VaR 99.6, Insurer ABC’s standard BCAR assessment is **“Very Strong.”** Its stress BCAR assessment is **“Adequate”** (positive at VaR 99, but negative at VaR 99.5).



ABC passes all three concentration checks. It also has financial flexibility. Therefore, its stress BCAR results are within the tolerance described in Exhibit B.6. Its revised BCAR assessment (“Very Strong”) is the same as its standard.

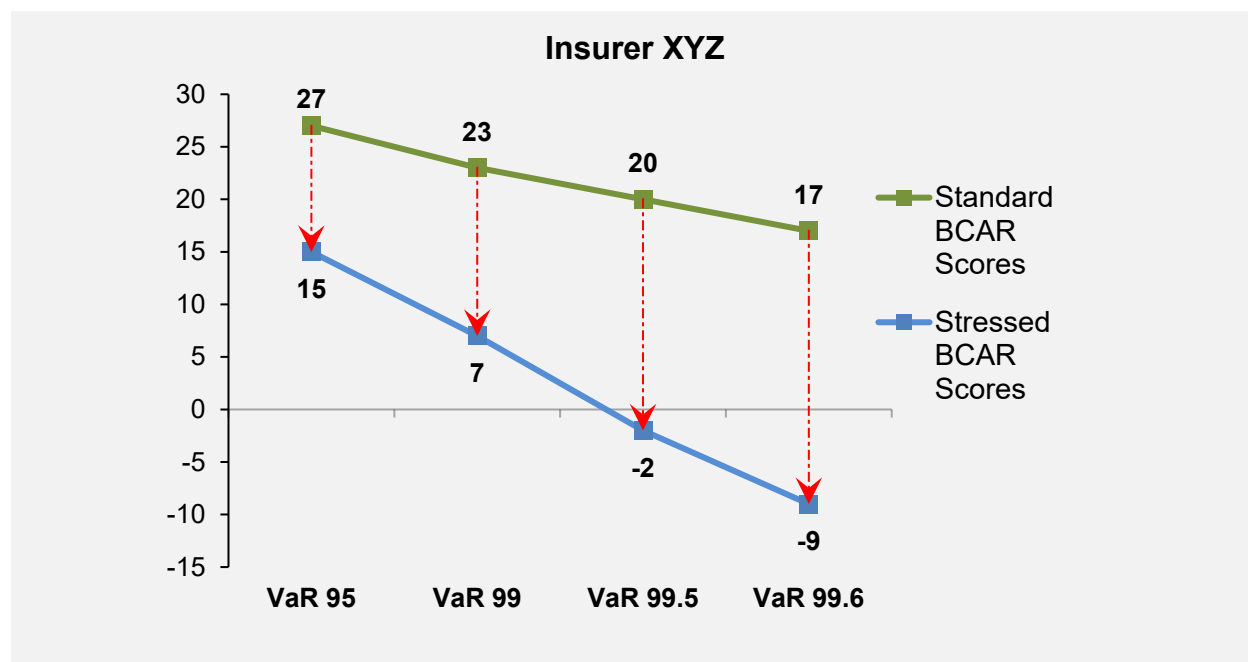
**Insurer ABC’s Revised BCAR Assessment = “Very Strong”**

The revised BCAR assessment of an insurer that fails one of the concentration checks and/or has a stress BCAR outside of the tolerance will generally be lower than that of the standard assessment. Analytical review of the insurer and its specific circumstances will determine the final revised BCAR assessment for such an insurer. Exhibit B.8 shows an example of an insurer failing the stress test.

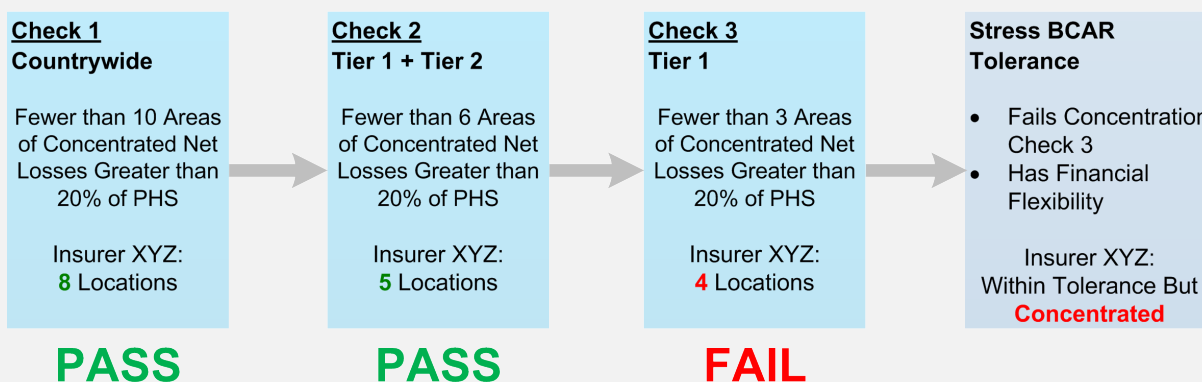


## The Treatment of Terrorism Risk in the Rating Evaluation

Exhibit B.8: Example of Insurer with Financial Flexibility Failing Terror Stress Test



With a standard BCAR score of 17 at VaR 99.6, Insurer XYZ’s standard BCAR assessment is **“Very Strong.”** Its stress BCAR assessment is **“Adequate”** (positive at VaR 99, but negative at VaR 99.5).



XYZ does have financial flexibility, and its stress BCAR results are within the tolerance described in **Exhibit B.6**. However, XYZ is concentrated and failed Check 3. The tolerances in **Exhibit B.6** are generally only extended to insurers that pass the concentration checks. Thus, following analytical review, XYZ’s revised BCAR assessment (“Strong”) is lower than its standard (“Very Strong”).

**Insurer XYZ’s Revised BCAR Assessment = “Strong”**

**Exhibit B.6** assumes that the insurer has the financial flexibility to quickly replace the lost surplus after the event. For those insurers that have limited financial flexibility, the stress BCAR tolerance is reduced as determined by analytical review of the insurer and its specific circumstances. AM Best’s

## The Treatment of Terrorism Risk in the Rating Evaluation

---

view of an insurer's financial flexibility does take into consideration overall market conditions, which vary over time.

As the expiration of the federal backstop draws near, insurers that fail the stress test will be required to present an action plan detailing the steps the insurer will take to reduce its exposure to terrorism risk in the event that a recovery from the federal backstop is not available.

### **Primary Insurers Not Triggering the Federal Backstop**

AM Best is also concerned with the potential scenario that a terrorism loss could occur but fail to trigger a recovery from the current terrorism backstop. The industry loss required to trigger coverage will eventually increase to \$200 million in 2020 (**Appendix 3**). This increasing industry trigger makes the likelihood that an insurer will suffer a loss without any reimbursement from the federal program a much greater concern. This is most likely to impact smaller insurers that provide coverage to businesses located in remote locations, or in locations situated far enough away from other structures that the industry loss is limited to the insurer's loss, and the insurer's loss is less than the industry trigger. Strong terrorism risk management is not limited to just the peak zones, and insurers should not hide behind the theoretically low probabilities of events in remote locations. As with all types of risk, including terrorism, insurers should be managing their exposures down to a reasonable level relative to surplus, by avoiding or mitigating any single large exposures.

A primary insurer whose largest net direct exposure is less than the industry trigger but is more than 25% of surplus may be viewed negatively within the balance sheet strength assessment. Insurers should be able to explain any risk mitigation activities in these circumstances.

At many locations, an insurer might provide coverage for one type of potential exposure, whereas the remaining exposures are insured by a separate, unaffiliated insurer. For example, workers' compensation coverage may be provided by one insurer, but the property exposure is protected by an unaffiliated insurer. In addition, some insurers may only offer protection for a portion of the exposure, such as the upper layers of a property exposure. For insurers that are exposed to only one of the many types of coverage at a given location, or that carry only a portion of the total exposure at that location, the insurer is expected to provide evidence that the total industry insured loss at that remote location would exceed the industry trigger to alleviate the concern that the federal backstop would not produce a recovery for the insurer.

### **Professional Reinsurers and BCAR**

Reinsurers with gross aggregate limits for any single zone in excess of 25% of surplus are considered to be materially exposed to terrorism risk. For reinsurers that have a material exposure to terrorism risk, AM Best compares the net aggregate limits for the largest concentration within a zone for conventional attacks; the largest net zonal aggregate for chemical, biological, radiological, and nuclear (CBRN) attacks; and the net PML from a natural catastrophe. The largest of these three amounts at each confidence level—after reflecting any reinstatement premiums—is used in the standard BCAR as B8.

# The Treatment of Terrorism Risk in the Rating Evaluation

---

Reinsurers are subject to the same terrorism stress test as primary insurers, but they use the larger of the two terror estimates mentioned above as the losses in steps 1 through 4 of the stress test.

In addition to the stress test, AM Best may also discuss the reinsurer's loss retentions net of retrocessions, risk appetite, strategy, underwriting guidelines, and mitigation program, as well as the reinsurer's ability to capture detailed and accurate information related to monitoring and managing the accumulations of risk.

## C. Enterprise Risk Management (ERM)

### Impact of CBRN and Other Types of Attacks in the Rating Evaluation

Even though AM Best has elected to use a five- to six-ton TNT truck bomb as the modeled attack for the deterministic loss scenario, AM Best still expects all insurers and reinsurers with material exposure to terrorism risk to identify, quantify, monitor, and manage their exposure to other types of attacks, both conventional and CBRN. As part of the ERM process, AM Best expects insurers to maintain a risk catalog of potential terror events and the potential losses created. AM Best also expects composite companies to include their exposures to life and health policies along with their property/casualty exposures when cataloging their potential events and losses. Companies should be willing and able to share these alternative scenarios when discussing their ERM process. A method of accumulating the risks and frequent, systematic reviews of the accumulations and their associated potential losses are also an expected component of ERM. Having a risk mitigation plan in place that adequately reduces the insurer's exposure to an acceptable level is important. Insurers that do not perform these functions are considered to have weaker ERM than those that do.

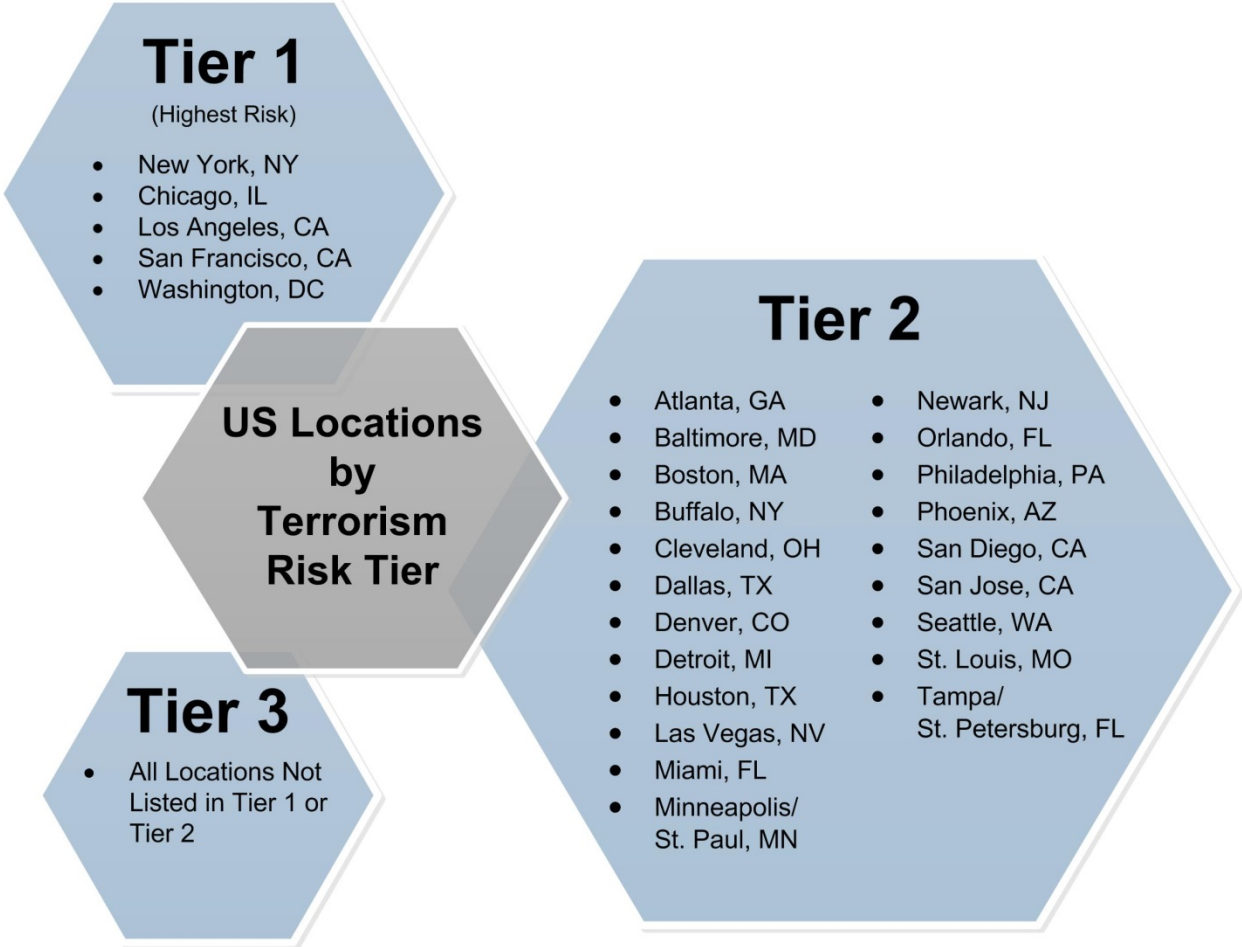
Relying solely on a federal backstop for protection could be problematic, especially for insurers with exposures in the largest cities, where CBRN losses easily could exceed the program cap and limit the actual recoveries. Although the insurer may not be legally obligated to pay claims once the cap is exceeded, the dispute risk could be enormous and costly as policyholders and claimants only receive a partial payment. The best way to avoid this type of potential problem is to enforce sound underwriting guidelines, limit the amount of coverage on a single risk, and prevent geographically concentrated accumulations of those risks.

### Insurer Estimates of Terrorism Loss Amounts

AM Best uses an insurer's estimate of its terrorism loss amount to facilitate discussion with the company on the methods it is using to manage terrorism risk. AM Best seeks to understand any drivers of differences between a company's modeled losses and the loss estimate by AM Best.

# The Treatment of Terrorism Risk in the Rating Evaluation

## Appendix 1: US Locations by Terrorism Risk Tiers



# The Treatment of Terrorism Risk in the Rating Evaluation

## Appendix 2: Sample Calculation of Terrorism Charge Used in BCAR

	A	B	C	D	E	F	G
Tier	TRIPRA Deductible	Largest Net of TRIPRA Exposure	Percent Geocoded to Street Address	Geocode Surcharge (%)	Surcharge for Exposures Smaller than Deductible	Surcharge for Exposures Larger than Deductible	Largest Exposure Adjusted for Geocoded Percentage [B+E+F]
1	\$200,000	\$305,000	82.5%	10%	\$0	\$14,300	\$319,300
2	\$200,000	\$260,000	72.5%	20%	\$0	\$19,600	\$279,600
3	\$200,000	\$237,000	62.5%	30%	\$0	\$22,500	\$259,500

	H	I	J	K	L	M
Tier	Annual Probability of Large Attack (%)	Conditional Probability of Attack in Tier (%)	Probability for Each Location (%) [H*I]	Number of Locations Net of TRIPRA greater than 10% of PHS	Locations Multiplied by Probability (%) [J*K]	Pretax Terrorism Charge [G*L]
1	10%	60%	6%	3	18%	\$57,474
2	10%	30%	3%	10	30%	\$83,880
3	10%	10%	1%	80	80%	\$207,600

	VaR 95	VaR 99	VaR 99.5	VaR 99.6
<b>Maximum Terrorism Charge</b> (Max of Column M)	\$207,600	\$207,600	\$207,600	\$207,600
<b>Natural Catastrophe PML</b> (Pre-tax)	\$100,000	\$175,000	\$210,000	\$275,000
<b>Final PML used in Standard BCAR</b> Max(Terrorism Charge, Natural Catastrophe PML)	\$207,600	\$207,600	\$210,000	\$275,000

The data for A, B, C, and K is typically collected from the SRQ.  
F is based on insurer co-pay over deductible as percentage of loss from Appendix 3.

# The Treatment of Terrorism Risk in the Rating Evaluation

---

## Appendix 3: Terrorism Risk Insurance Program Reauthorization Act of 2015

Calendar Year	Insurer's Deductible <sup>1</sup> (%)	Insurer's Co-pay <sup>2</sup> (%)	Industry Trigger (\$ Millions)	Industry Aggregate Retention (\$ Billions)
2019	20%	19%	\$180	\$37.5
2020	20%	20%	\$200	TBD <sup>3</sup>

---

<sup>1</sup>Expressed as percent of prior year's direct earned premium on TRIPRA covered lines.

<sup>2</sup>Expressed as percent of losses above insurer's deductible.

<sup>3</sup>To be determined by the Secretary of the Treasury based on a 3-year average of insurer deductibles

Published by A.M. Best Rating Services, Inc.

## METHODOLOGY

**A.M. Best Rating Services, Inc.**  
Oldwick, NJ

**CHAIRMAN & PRESIDENT Larry G. Mayewski**  
**EXECUTIVE VICE PRESIDENT Matthew C. Mosher**  
**SENIOR MANAGING DIRECTORS Douglas A. Collett, Edward H. Easop,**  
**Stefan W. Holzberger, James F. Snee**

**WORLD HEADQUARTERS**  
1 Ambest Road,  
Oldwick, NJ 08858  
Phone: +1 908 439 2200

**MEXICO CITY**  
Paseo de la Reforma 412,  
Piso 23,  
Mexico City, Mexico  
Phone: +52 55 1102 2720

**LONDON**  
12 Arthur Street, 6th Floor,  
London, UK EC4R 9AB  
Phone: +44 20 7626 6264

**DUBAI\***  
Office 102, Tower 2,  
Currency House, DIFC  
P.O. Box 506617,  
Dubai, UAE  
Phone: +971 4375 2780

\*Regulated by the DFSA as a Representative Office

**HONG KONG**  
Unit 4004 Central Plaza,  
18 Harbour Road,  
Wanchai, Hong Kong  
Phone: +852 2827 3400

**SINGAPORE**  
6 Battery Road,  
#40-02B,  
Singapore  
Phone: +65 6589 8400



**Best's Financial Strength Rating (FSR):** an independent opinion of an insurer's financial strength and ability to meet its ongoing insurance policy and contract obligations. An FSR is not assigned to specific insurance policies or contracts.

**Best's Issuer Credit Rating (ICR):** an independent opinion of an entity's ability to meet its ongoing financial obligations and can be issued on either a long- or short-term basis.

**Best's Issue Credit Rating (IR):** an independent opinion of credit quality assigned to issues that gauges the ability to meet the terms of the obligation and can be issued on a long- or short-term basis (obligations with original maturities generally less than one year).

### Rating Disclosure: Use and Limitations

A Best's Credit Rating (BCR) is a forward-looking independent and objective opinion regarding an insurer's, issuer's or financial obligation's relative creditworthiness. The opinion represents a comprehensive analysis consisting of a quantitative and qualitative evaluation of balance sheet strength, operating performance and business profile or, where appropriate, the specific nature and details of a security. Because a BCR is a forward-looking opinion as of the date it is released, it cannot be considered as a fact or guarantee of future credit quality and therefore cannot be described as accurate or inaccurate. A BCR is a relative measure of risk that implies credit quality and is assigned using a scale with a defined population of categories and notches. Entities or obligations assigned the same BCR symbol developed using the same scale, should not be viewed as completely identical in terms of credit quality. Alternatively, they are alike in category (or notches within a category), but given there is a prescribed progression of categories (and notches) used in assigning the ratings of a much larger population of entities or obligations, the categories (notches) cannot mirror the precise subtleties of risk that are inherent within similarly rated entities or obligations. While a BCR reflects the opinion of A.M. Best Rating Services Inc., (AMBR) of relative creditworthiness, it is not an indicator or predictor of defined impairment or default probability with respect to any specific insurer, issuer or financial obligation. A BCR is not investment advice, nor should it be construed as a consulting or advisory service, as such; it is not intended to be utilized as a recommendation to purchase, hold or terminate any insurance policy, contract, security or any other financial obligation, nor does it address the suitability of any particular policy or contract for a specific purpose or purchaser. Users of a BCR should not rely on it in making any investment decision; however, if used, the BCR must be considered as only one factor. Users must make their own evaluation of each investment decision. A BCR opinion is provided on an "as is" basis without any expressed or implied warranty. In addition, a BCR may be changed, suspended or withdrawn at any time for any reason at the sole discretion of AMBR.

Version 020116