



November 10, 2006

Mark Stahlhuth, Esq.
Senior Counsel
Missouri Department of Insurance
P.O. Box 690
Jefferson City, MO 65102

Re: Rule No. 20 CSR 200-18.020

Dear Mr. Stahlhuth:

This letter follows up our letter dated October 11, 2006 (copy enclosed). In this letter, the National Risk Retention Association ("NRRA") objected to subparagraph (2)(A) of Rule No. 20 CSR 200-18.020, which would require any risk retention group domiciled in a state other than Missouri to utilize statutory accounting principles ("SAP") in the preparation of its annual statement.

In the October, 2006 edition of the *Risk Retention Reporter*, you are quoted as expressing Missouri's "willingness to review GAAP statements on a case-by-case basis provided that such statements made appropriate disclosure of any deviations from SAP."

Would you please confirm that that statement represents the policy of the Missouri Department of Insurance? Your response to this letter would be greatly appreciated.

Thank you in advance for your attention to this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Donald S. Breakstone", written over a horizontal line.

Donald S. Breakstone
Chairman of the Board