

ARTER & HADDEN

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November 7, 1990

Honorable James F. Rill
Assistant Attorney General
Antitrust Division
U. S. Department of Justice
10th and Pennsylvania Ave. N.W.
Washington, D.C. 20530

Re: Request for Business Review

Dear Mr. Rill:

This letter is submitted on behalf of Experience Information Bureau, Inc. ("EIB") to request business review by the Antitrust Division pursuant to 28 C.F.R. § 50.6 (1990).

EIB is a North Carolina corporation which has been formed primarily to serve as a clearing house for underwriters of credit life and disability insurers. It is not yet operational. EIB is neither owned nor operated by any insurance carrier. Its principal stockholder is an independent insurance agent. A copy of its articles of incorporation are enclosed.

EIB proposes to function much like a credit bureau for insurance carriers. It proposes to collect and distribute loss ratio information among its subscribers to assist them in evaluating risk. Much like a credit bureau which collects and disseminates information on individuals, EIB proposes to disseminate data relating to the experience of group creditor clients, *i.e.*, lending institutions. To that end, EIB proposes to collect from subscribing insurance carriers data on their underwriting experiences for credit life and disability insurance for the past six years. It will ask for the name and address of the lending institution, the average term, average age and average duration of loans, and data on the net written premium, earned premium, claims incurred and paid, and the type of insurance in force. From this data, EIB will calculate the loss ratio. A sample of the suggested report to be generated is attached.

IN CLEVELAND
ARTER & HADDEN
1100 Huntington Building
Cleveland, Ohio 44115
216/696-1100

IN COLUMBUS
ARTER & HADDEN
10 West Broad Street
Columbus, Ohio 43215
614/221-3155

IN DALLAS
ARTER & HADDEN
1717 Main Street, Suite 4100
Dallas, Texas 75201
214/761-2100

IN LOS ANGELES
ARTER, HADDEN,
LAWLER, FELIX & HALL
700 South Flower Street
Los Angeles, California 90017
213/629-9300

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Honorable James F. Rill
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Subscribers will pay membership dues annually which will entitle them to obtain the experience data collected from other subscribers for a nominal charge. EIB will neither comment on the data nor make any recommendation concerning the information disclosed. The disclosure will be accompanied by a statement that the information is conveyed for risk information purposes only and that discretion whether to deal with any entity on whom information is given is solely within the requesting member.

It is EIB's hope and belief that its contemplated business will facilitate competition and efficiency. We hope this information provides a basis on which for you to inform us of the Department's enforcement intentions concerning the proposed conduct. If you need additional information or have any questions, please do not hesitate to contact me. Thank you in advance for your consideration of this matter.

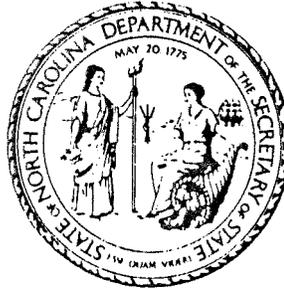
Sincerely,



Laura Metcoff Klaus

cc: Mr. Fred R. Oosting

State of North Carolina



Department
of the
Secretary of State

To all to whom these presents shall come, Greeting:

I, Thad Eure, *Secretary of State of the State of North Carolina*, do hereby certify the following and hereto attached (2 sheets) to be a true copy of

ARTICLES OF INCORPORATION

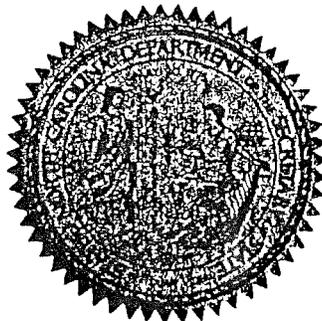
OF

EXPERIENCE INFORMATION BUREAU, INC.

and the probates thereon, the original of which was filed in this office on the 19th day of August 1987, after having been found to conform to law.

In Witness Whereof, I have hereunto set my hand and affixed my official seal.

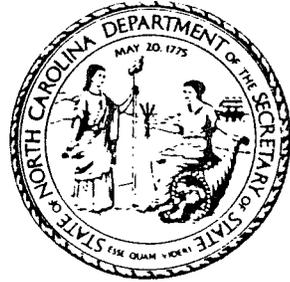
Done in Office, at Raleigh, this 19th day of August in the year of our Lord 1987.




Secretary of State

SIGNATURE OMITTED PURSUANT TO
CHAPTER 349, 1987 SESSION LAWS

By
Deputy Secretary of State



State of North Carolina

NOTICE

The issuance of a corporate charter to any domestic corporation or a certificate of authority to any foreign corporation does not authorize the use in this State of the corporate name in violation of the rights of any third party under the Federal Trademarks Act, the Trademark Act of this State, a trade name or the common law; and the issuance of such charter or certificate will not be a defense to an action for violation of any such rights.

Certified Copy
from
The Department of The
Secretary of State
to be Recorded
with the
Register of Deeds
of County of
Registered Office

EXPERIENCE INFORMATION BUREAU

Account: FINANCIAL LENDING INSTITUTION

Address: 123 YOUR STREET

City: YOUR CITY

State: YOUR STATE

Zip: 12345

Date: 12/10/90 Report Date: 12/06/90 Begin Date: 11/01/87 End Date: 11/30/90

Average Term: 43 Mos

Average Duration: 37 Mos

Average Age: 44 Yrs

Type B	Life	Disability	Combined
Net Written Premium:	1234567	2345678	3580245
Earned Premium:	617284	1423456	2040740
Claims Paid:	389776	789677	1179453
E/Paid Loss Ratio:	0.63	0.55	0.58
Claims Incurred:	411381	1323342	1734723
E/Incurred Loss Ratio:	0.67	0.93	0.85
Premium Earned By:	78'S	78'S/PR	

Single Reducing Y
Joint Reducing Y
Level Y

Wait 14
Begin 1
Pre Exist Y

Note: INCREASING NUMBER OF LONG TERM OPEN DISABILITY CLAIMS

Underwriter: INSURANCE COMPANY OF THE NORTH SOUTH EAST WEST.

This information is conveyed for risk information purposes only and that discretion whether to deal with any entity on whom information is given is solely within the requesting member.

ARTICLES OF INCORPORATION
OF

EXPERIENCE INFORMATION BUREAU, INC.

DOCUMENT #111100
DATE 00/00/00 TIME 12:11
FILED
THAT DATE
SECRETARY OF STATE
RECORDS AND ADMINISTRATION

We, the undersigned natural persons of the age of eighteen years or more, do hereby associate ourselves into a business corporation under the laws of the State of North Carolina, as contained in Chapter 55 of the General Statutes of North Carolina, entitled "Business Corporation Act," and the several amendments thereto, and to that end do hereby set forth:

1. The name of the Corporation is EXPERIENCE INFORMATION BUREAU, INC.
2. The period of duration of the corporation shall be perpetual.
3. The purposes for which the corporation is organized are:
 - a. the operation of a service bureau for the collection and dissemination of information beneficial to its members.
 - b. To engage in any other lawful business authorized by law.
4. The total authorized capital stock of the corporation shall be One Hundred Thousand Dollars (\$100,000), divided into 1,000 shares of common stock, with a par value of \$100.00 per share.
5. The minimum amount of consideration for its shares to be received by the corporation before it shall commence business is \$500.00.
6. The address of the initial registered office of the corporation is 2201 Leona Drive, Greensboro, Guilford County, North Carolina 27406, and the name of the initial registered agent at such address is Fred R. Oosting.
7. The number of directors of the corporation may be fixed by the bylaws, but shall not be less than two (except as permitted by N.C.G.S. 55-25).

The number of directors constituting the initial board of directors shall be two, and the name and address of each person who is to serve as a director until the first meeting of shareholders or until his successor be elected and qualified is:

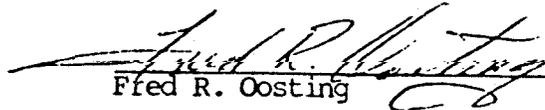
NAME	ADDRESSES
Fred R. Oosting	2201 Leona Drive Greensboro, NC 27406
Kermit F. Oosting	2201 Leona Drive Greensboro, NC 27406

8. The name and address of each incorporator is:

Fred R. Oosting

2201 Leona Drive
Greensboro, NC 27406

IN TESTIMONY WHEREOF, we have hereunto set our hands, this the 11th day of August, 1987.


Fred R. Oosting

NORTH CAROLINA - GUILFORD COUNTY

This is to certify, that on the 11th day of August, 1987, before me, a Notary Public, personally appeared FRED R. OOSTING, who I am satisfied is the person named in and who executed the foregoing Articles of Incorporation, and I have first made known to him the contents thereof, he did acknowledge that he signed and delivered the same as his voluntary act and deed for the uses and purposes therein expressed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal, this the 11th day of August, 1987.


Notary Public

My commission expires:

JUDY McCONNELL

NOTARY PUBLIC

GUILFORD COUNTY, NC
Commission Expires 11/20/87