

New York State Insurance Department

2006
Annual Ranking
of
Automobile
Insurance Complaints

(based on 2005 data)

George E. Pataki
Governor

Howard Mills
Superintendent of Insurance



December 2006

The Annual Ranking of Automobile Insurance Complaints

Overview

Smart insurance consumers make informed decisions when seeking the best coverage for their auto insurance dollar. They talk to friends and neighbors, search the Internet, check the Insurance Department's *Annual Consumer Guide to Automobile Insurance* and use the *Annual Ranking of Automobile Insurance Complaints* to evaluate competing insurance companies.

With auto rates coming down for New York consumers in record numbers, it's important to remember that price is important, but so is service. Consumers want an insurance company that will pay legitimate claims promptly and fairly. It is not too much to ask.

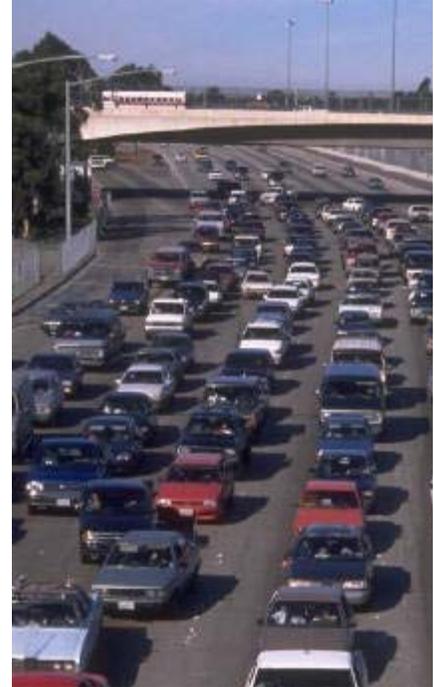
The *Annual Ranking of Automobile Insurance Complaints* ranks 45 automobile insurance companies or groups of companies based on the 2005 complaints upheld against them by the New York State Insurance Department. Each company or group is ranked by its complaint ratio. A complaint ratio is the number of private passenger automobile insurance complaints *upheld* against an insurer as a percentage of that insurer's average New York State private passenger automobile insurance premium.

An upheld complaint occurs when the Department agrees with a consumer that an auto insurer made an inappropriate decision. The report ranks insurers from best (lowest complaint ratio) to worst (highest complaint ratio).

Total complaints (both upheld and non-upheld) are included in this report for informational purposes. **Insurers with the fewest upheld complaints per million dollars of premium appear at the top of the list.**

Please note that the *Annual Ranking of Automobile Insurance Complaints* includes only those complaints handled by the Insurance Department, not complaints made to individual insurance companies.

An increase from last year, three insurers topped this year's complaint ranking, each boasting no upheld complaints in 2005: Atlantic Companies, Eveready Insurance Company and Fairfax Financial Group. With only one upheld complaint, Amica Mutual Insurance Company, a perennial top ten finisher, ranked fourth among the 45 insurers or groups compared in this report. Of the ten insurers with the highest average premium, Progressive finished the highest at 10th in the rankings. Four other top ten companies finished among the top 25 in 2004. They are Central Services (11th), State Farm (12), Liberty Mutual (13) and Nationwide (21). In addition, the Department recognizes 19 insurance companies that were among the top 25 performers in each of the past three years. These 19 companies are listed in the table on page 4 of this report.



Typical complaints against auto insurers are those involving monetary disputes, such as the value of a total loss. Complaints about companies that fail to renew customers as well as insurers that do not pay claims promptly are also common.

All companies or groups with at least \$10 million in average private passenger auto insurance premiums for 2004-2005 are included in the ranking. Small companies or groups (those with less than \$10 million in average premium) are included only if they had ten or more complaints upheld against them. There was one that met that criterion in 2005.

Company Complaint Ranking

The average complaint ratio for all auto insurers, including those with less than \$10 million in premium, was 0.15 per \$1 million in premium in 2005. This equates roughly to one upheld complaint for every \$6.6 million in premium. The ratio is derived by dividing the number of closed complaints upheld against all companies in 2005 (1,600) by the average 2004-2005 premium for all companies (\$10,485.9 million, or \$10.5 billion). Since many complaints closed in any given year are initiated the previous year, the complaint ratios are calculated using an average of two years' premium data.

Most of the top ten ranked insurers were relatively small. The only two with over 100 million in premiums were Progressive with \$857.4 million and Amica Mutual with \$106 million. Of the top ten finishers in 2005, three were top ten companies in 2004.

Of the three largest New York State auto insurers, Allstate and State Farm posted gains in position. Allstate moved from a rank of 30th in 2004 to 26th in 2005, while State Farm moved from 20th to 12th. With an 0.08 complaint ratio, State Farm ranked 12th, the best among the State's top three insurers, and above the insurer's 20th place finish the previous year. State Farm has ranked among the top 25 insurers in each of the past three years.

“The average complaint ratio for all auto insurers was 0.15 per \$1 million in premium.”

With a 17.9% market share, Berkshire-Hathaway (GEICO) this year became the largest private passenger auto insurer based on 2004-2005 average premium. Allstate — with a 17.3% market share — was a strong second. GEICO had surpassed State Farm in last year's rankings to become New York State's second largest private passenger auto insurer, and this year surpassed Allstate to become New York's largest.

Market share for three of the four largest insurers increased over the year, with GEICO showing the biggest rise, increasing from an average 15.8% market share in the previous year's ranking to a 17.9% share in the current ranking. State Farm was the only insurer among the four to lose market share over the year, falling from a 12.1% to a 10.8% share. Several smaller insurers among the ten largest auto insurers also lost market share, including St. Paul Travelers, Central Services and Liberty Mutual. Overall, the top ten auto insurers comprised 77.6% of the market in the current ranking, up from 76.7% the previous year.

This ranking should not be the only factor to consider when selecting an auto insurer. Price is also a major consideration, as are recommendations from family, friends, co-workers and neighbors. The Department's annual *Consumer Guide to Automobile Insurance* contains representative price information for major New York auto insurers in addition to the Assigned Risk Plan. Copies of the

guide and the ranking may be obtained free by calling the Department's toll-free telephone number (800) 342-3736. In addition, both publications are accessible through the Insurance Department's Web site: **www.ins.state.ny.us**.

Best Performers

The 25 auto insurers with the **best performance** in 2005 are listed below. Of these, 21 were among the 25 top performers in 2004.

Nineteen companies finished among the top 25 auto insurers in each of the past three years. For their consistency of performance, these insurers are highlighted in this report. The 19 companies appear in boldface in the table below. Note that three of the ten highest-ranking insurers in the current ranking finished in the *top 10* in each of the previous two rankings. In addition, five of the ten largest insurers in New York State were among the current top 25 companies. They are Progressive (ranked 10th), Central Services (11), Liberty Mutual (13), State Farm (12) and Nationwide (21).

Prior Year Complaint Rankings of Top 25 New York State Private Passenger Auto Insurance Companies

Company or Group	Complaint Ratio	Current Ranking*	CY 2004 Ranking	CY 2003 Ranking
Atlantic Companies	0.00	1	27	6
Eveready Ins Co	0.00	2	14	13
Fairfax Financial	0.00	3	19	43
Amica Mutual Grp	0.01	4	3	1
Response Ins Group	0.02	5	12	11
Erie Ins Grp	0.03	6	24	3
Preferred Mutual Ins Co	0.04	7	5	4
Merchants Mutual	0.04	8	17	18
Electric Ins Grp	0.06	9	2	8
Progressive Ins Grp	0.07	10	16	19
Central Services Grp	0.07	11	18	12
State Farm IL	0.08	12	20	15
Liberty Mutual Grp	0.08	13	23	20
Chubb & Son Inc	0.08	14	11	16
Countrywide Ins Co.	0.08	15	9	25
Harleysville Group	0.08	16	8	10
United Services Automobile				
Asn Grp	0.09	17	6	2
Unitrin Grp	0.09	18	10	17
GMAC Ins Holding	0.10	19	31	28
Mercury General Grp	0.10	20	39	42
Nationwide Group	0.11	21	22	26
Hartford F & C Group	0.11	22	35	31
Natl Grange Mut Ins Grp	0.11	23	7	14
American Express Grp	0.11	24	4	22
American Modern Ins Grp	0.11	25	1	7

* Based on Calendar Year (CY) 2005 complaint data.

Worst Performers

The ten insurers with the worst performance in the current ranking are listed below. The two companies in boldface indicate those insurers that were ranked among the ten lowest in each of the past three years.

Prior Year Complaint Rankings of Bottom Ten New York State Private Passenger Auto Insurance Companies

Company or Group	Complaint Ratio	Current Ranking*	CY 2004 Ranking	CY 2003 Ranking
State-Wide Ins Co	0.20	36	36	33
Zurich Ins Group	0.21	37	37	39
Safeco Ins Grp	0.28	38	43	44
White Mountains Grp	0.30	39	41	36
American Intl Group	0.36	40	33	40
Hannover Group	0.56	41	--	--
Credit Suisse Group	0.84	42	38	5
Infinity Prop & Cas Ins Grp	1.31	43	47	47
Tri-State Consumer Ins Co	1.39	44	44	35
Long Island Insurance Company	8.24	45	46	--

* Based on Calendar Year (CY) 2005 data.

Largest Insurers

Below is the complaint ranking for the ten largest insurers in New York State. More than seven in ten New Yorkers purchase insurance from one of these ten insurers.

Complaint Ratios of Ten Largest Private Passenger Auto Insurers New York State, 2005

Company or Group	Complaint Ratio	Current Ranking*	2004-05 Avg. Premium (in millions)	Market Share
Berkshire-Hathaway (GEICO)	0.19	34	\$1,879.8	17.9%
Allstate	0.13	26	1,813.5	17.3
State Farm	0.08	12	1,132.2	10.8
Progressive	0.07	10	857.4	8.2
St. Paul Travelers	0.13	27	617.9	5.9
Liberty Mutual	0.08	13	580.1	5.5
Central Services	0.07	11	345.2	3.3
White Mountains	0.30	39	317.1	3.0
Nationwide	0.11	21	315.1	3.0
Metropolitan	0.13	28	278.8	2.7
Top Ten			\$8,137.1	77.6%
Total (all companies, incl. those with less than \$10 million in premium)			\$10,485.9	100%

* Based on Calendar Year 2005 data.

Frequently Asked Questions



What is a complaint ratio?

Each year the Department closes thousands of complaints against auto insurers. Some are justified, while others are not. Those that are justified are counted against a company and measured in relation to the premiums that the company writes. The company's complaints are divided by its average annual written premium to arrive at a complaint ratio.

Why not just list the total complaints for each company?

Insurance companies that write a large amount of business typically generate a larger number of complaints than smaller companies. Complaint ratios allow consumers to compare easily small companies with large companies, by looking at complaints as a percentage of premiums written.

How many total auto complaints do you close?

In 2005, the Department's Consumer Services Bureau closed a total of 9,939 private passenger auto insurance complaints. The Department also handles commercial auto complaints, which are not included in determining complaint ratios.

Why are only "upheld" complaints included in the ratio?

A complaint is counted against a company only if the company was found to be at fault in a disputed matter by the New York Insurance Department. If a company acted in a legally responsible manner, it is not penalized. However, the total number of complaints is published for informational purposes.

I complained directly to my insurer. Is that counted?

No, only complaints closed by the Insurance Department are counted. Consumers are encouraged to try to settle their differences directly with their insurers. If that doesn't work, they should contact the Insurance Department to file a complaint. Please note that the Insurance Department accepts complaints through its Web site, www.ins.state.ny.us.

What are the most common complaints?

Complaints about monetary settlements are the most common, followed by complaints about policy terminations.

What is the average complaint ratio?

The average complaint ratio in 2005 was 0.15 complaints per million dollars of premium. This means that the average auto insurer had roughly one upheld complaint for every \$6.6 million in auto premium written in New York State.

What is a “question of fact” complaint?

A question of fact arises when a consumer and an insurer cannot agree as to the facts of the case. For example, a driver is involved in an accident with an insurer’s policyholder and there are no witnesses. The driver says he did not run a red light, while the insurer insists he did (perhaps based on its own policyholder’s statement). Since the examiner handling the complaint was not at the scene of the accident and there were no witnesses, the complaint is generally closed as a “question of fact” dispute and does not count against an insurer.

How much should I depend on this ranking?

It is one of several tools you should use. Certainly price is another key factor. Also, do not underestimate the recommendations of your friends, neighbors and co-workers. They can be excellent sources of information.

Where can I get pricing information?

Representative premiums of some of New York’s leading auto insurers are included in our annual *Consumer Guide to Automobile Insurance* available free of charge by calling the Department’s toll-free telephone number, (800) 342-3736, as well as at the Department’s web site, www.ins.state.ny.us. Also available at the website is the Department’s interactive auto premium calculator.

Are companies at the bottom of the list considered poor performers?

Not necessarily. Because the ranking includes virtually all auto insurers in the State, some must be at the bottom of each year’s list even if every company is performing well. Companies do improve over time and sometimes — because ratios are used to determine an insurer’s ranking — only one or two additional complaints per year can make a big difference in a small company’s rank.

Private Passenger Auto Insurance Complaint Ranking New York State, 2005

Number of Complaints Closed in 2005 by the NYS Insurance Department

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
1	ATLANTIC COMPANIES ATLANTIC MUTUAL INS CO CENTENNIAL INS CO	0.00	0	2	5	7	20.046
2	EVEREADY INS CO	0.00	0	12	18	30	18.828
3	FAIRFAX FINANCIAL GRP HUDSON INS CO TIG INS CO	0.00	0	14	30	44	15.867
4	AMICA MUTUAL GRP AMICA MUTUAL INS CO	0.01	1	7	16	24	106.027
5	RESPONSE INS GROUP RESPONSE INDEMNITY CO RESPONSE INDEMNITY COMPANY OF DELAWARE RESPONSE INS CO RESPONSE WORLDWIDE DIRECT AUTO INS CO RESPONSE WORLDWIDE INS CO WARNER INS CO	0.02	1	15	42	58	47.774
6	ERIE INS GRP ERIE INS CO ERIE INS CO OF NY	0.03	2	9	34	45	70.365
7	PREFERRED MUTUAL INS CO	0.04	2	21	35	58	55.716
8	MERCHANTS MUTUAL MERCHANTS INS CO OF NH INC MERCHANTS MUTUAL INS CO	0.04	1	10	17	28	23.066
9	ELECTRIC INS GRP ELECTRIC INS CO	0.06	1	2	3	6	16.236

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
10	PROGRESSIVE INS. GROUP NATIONAL CONTINENTAL INS CO PROGRESSIVE CAS INS CO PROGRESSIVE HALCYON INS CO PROGRESSIVE NORTHEASTERN INS CO PROGRESSIVE NORTHERN INS. CO. PROGRESSIVE NORTHWESTERN INSURANCE CO. PROGRESSIVE SPECIALTY INS CO UNITED FINANCIAL CASUALTY INS CO	0.07	59	156	338	553	857.369
11	CENTRAL SERVICES GRP A. CENTRAL INSURANCE COMPANY NEW YORK CENTRAL MUTUAL FIRE INS CO	0.07	25	127	205	357	345.150
12	STATE FARM IL STATE FARM FIRE AND CAS CO STATE FARM MUTUAL AUTOMOBILE INS CO	0.08	96	254	378	728	1132.159
13	LIBERTY MUTUAL GRP EXCELSIOR INS CO FIRST LIBERTY INS CORP LIBERTY INS CORP LIBERTY MUTUAL FIRE INS CO LIBERTY MUTUAL INS CO LM GENERAL INS CO LM P & C INS CO LM PERSONAL INS CO NETHERLANDS INS CO PEERLESS INS CO	0.08	44	237	340	621	579.558

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
14	CHUBB & SON INC CHUBB INDEMNITY INS CO FEDERAL INS CO GREAT NORTHERN INS CO PACIFIC INDEMNITY CO VIGILANT INS CO	0.08	9	10	14	33	107.407
15	COUNTRYWIDE INS CO	0.08	5	117	181	303	61.037
16	HARLEYSVILLE GROUP HARLEYSVILLE INS CO OF NY HARLEYSVILLE WORCESTER INS CO	0.08	1	3	4	8	12.541
17	UNITED SERVICES AUTOMOBILE ASN GRP UNITED SERVICES AUTOMOBILE ASN USAA CAS INS CO USAA GENERAL INDEMNITY CO	0.09	17	19	39	75	191.211
18	UNITRIN GRP KEMPER INDEPENDENCE INSURANCE COMPANY UNITRIN ADVANTAGE INS CO UNITRIN AUTO & HOME INS CO UNITRIN DIRECT INSURANCE COMPANY UNITRIN DIRECT P & C CO UNITRIN PREFERRED INS CO	0.09	12	25	55	92	139.328

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
19	GMAC INS HOLDING CIM INS CORP INTEGON CASUALTY INS CO INTEGON NATIONAL INS CO INTEGON PREFERRED INS CO MIC PROPERTY & CASUALTY INS CORP MOTORS INS CORP NATIONAL GENERAL INS CO NEW SOUTH INS CO	0.10	18	33	68	119	172.414
20	MERCURY GENERAL GRP MERCURY CASUALTY COMPANY	0.10	3	12	13	28	29.637
21	NATIONWIDE GROUP NATIONWIDE ASSURANCE CO NATIONWIDE GENERAL INS CO NATIONWIDE INSURANCE COMPANY OF AMERICA NATIONWIDE MUTUAL FIRE INS CO NATIONWIDE MUTUAL INS CO NATIONWIDE PROPERTY & CAS INS CO TITAN INDEMNITY COMPANY VICTORIA FIRE & CASUALTY CO VICTORIA NATIONAL INS. CO. VICTORIA SELECT INS. CO.	0.11	36	84	153	273	315.091

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
22	HARTFORD F & C GROUP HARTFORD ACCIDENT & INDEMNITY CO HARTFORD CASUALTY INS CO HARTFORD FIRE INS CO HARTFORD INS CO OF THE MIDWEST HARTFORD INSURANCE COMPANY OF ILLINOIS HARTFORD UNDERWRITERS INS CO PROPERTY AND CASUALTY INS. CO. OF HARTFORD SENTINEL INSURANCE COMPANY TRUMBULL INSURANCE COMPANY TWIN CITY FIRE INS CO	0.11	26	42	104	172	226.179
23	NATL GRANGE MUT INS GRP MAIN STREET AMERICA ASSURANCE CO NATIONAL GRANGE MUTUAL INS CO	0.11	9	23	32	64	78.720
24	AMERICAN EXPRESS GRP AMEX ASSURANCE COMPANY	0.11	3	6	10	19	28.457
25	AMERICAN MODERN INS GRP AMERICAN FAMILY HOME INS CO AMERICAN MODERN HOME INS CO	0.11	2	1	6	9	18.662
26	ALLSTATE INS. GROUP ALLSTATE INDEMNITY CO ALLSTATE INS CO DEERBROOK INS. CO. ENCOMPASS INDEMNITY CO	0.13	244	504	647	1395	1813.482

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
27	ST PAUL TRAVELERS GRP AUTOMOBILE INS CO OF HARTFORD CT CHARTER OAK FIRE INS CO FARMINGTON CASUALTY CO PHOENIX INSURANCE CO STANDARD FIRE INS CO TRAVCO INSURANCE CO. TRAVELERS CAS CO OF CONN TRAVELERS COMMERCIAL INS CO TRAVELERS HOME AND MARINE INSURANCE CO. TRAVELERS INDEMNITY CO TRAVELERS INDEMNITY CO OF AMERICA TRAVELERS INDEMNITY CO. OF CT TRAVELERS PROP CAS CO OF AM TRAVELERS PROP CAS INS CO	0.13	78	122	262	462	617.885
28	METROPOLITAN GROUP ECONOMY PREMIER ASSURANCE COMPANY METROPOLITAN CASUALTY INS CO METROPOLITAN GENERAL INS CO METROPOLITAN GROUP PROPERTY AND CASUALTY INS CO METROPOLITAN PROPERTY & CASUALTY INS CO	0.13	35	55	71	161	278.805
29	ALLIANZ INS. GROUP AMERICAN AUTOMOBILE INS CO AMERICAN INS CO ASSOCIATED INDEMNITY CORP FIREMAN'S FUND INS CO FIREMAN'S FUND INS CO OF WI NATIONAL SURETY CORP	0.14	3	1	9	13	21.536

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
30	CNA INSURANCE GROUP AMERICAN CASUALTY CO OF READING PA BUCKEYE UNION INS CO CONTINENTAL CASUALTY CO CONTINENTAL INS CO ENCOMPASS HOME AND AUTO INSURANCE CO ENCOMPASS INDEPENDENT INSURANCE COMPANY ENCOMPASS INSURANCE CO OF AMERICA ENCOMPASS PROPERTY AND CASUALTY CO FIDELITY & CASUALTY CO OF NY FIREMEN'S INS CO OF NEWARK NJ GLENS FALLS INS CO KANSAS CITY FIRE & MARINE INS CO NATIONAL BEN FRANKLIN INS CO OF IL NATIONAL FIRE INS CO OF HARTFORD TRANSPORTATION INS CO VALLEY FORGE	0.15	15	29	40	84	102.951
31	UTICA NATIONAL INS GROUP GRAPHIC ARTS MUTUAL INS CO REPUBLIC-FRANKLIN INS CO UTICA MUTUAL INS CO UTICA NATIONAL INS CO OF TX UTICA NATL ASSUR CO	0.15	7	11	59	77	45.496
32	INTERBORO MUTUAL INDEMNITY INS CO	0.15	3	18	44	65	20.024

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
33	ALLMERICA FINANCIAL CORP ALLMERICA FINANCIAL ALLIANCE INS. CO. CITIZENS INS CO OF AMERICA HANOVER INS CO MASSACHUSETTS BAY INS CO	0.16	10	9	22	41	63.307
34	BERKSHIRE-HATHAWAY GEICO CASUALTY CO GEICO GENERAL INS CO GEICO INDEMNITY CO GOVERNMENT EMPLOYEES INS CO	0.19	365	424	741	1530	1879.761
35	AMERICAN NATIONAL FINANCIAL GRP FARM FAMILY CASUALTY INS CO	0.19	7	8	16	31	37.237
36	STATE-WIDE INS CO	0.20	8	22	37	67	40.752
37	ZURICH INS GROUP ASSURANCE COMPANY OF AMERICA FARMERS NEW CENTURY INS CO FOREMOST INS CO FOREMOST PROPERTY & CASUALTY INS CO MARYLAND CASUALTY CO NORTHERN INS CO OF NY UNIVERSAL UNDERWRITERS INS CO VALIANT INS CO	0.21	14	31	42	87	66.965

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
38	SAFECO INS GRP AMERICAN STATES INS CO FIRST NATIONAL INSURANCE COMPANY OF AMERICA GENERAL INS CO OF AMERICA SAFECO INS CO OF AMERICA SAFECO INS CO OF INDIANA SAFECO NATIONAL INS CO	0.28	10	12	40	62	35.370
39	WHITE MOUNTAINS GRP AMERICAN CENTRAL INS CO AMERICAN EMPLOYERS INS CO AUTO ONE INS CO AUTOONE SELECT INSURANCE COMPANY EMPLOYERS FIRE INS CO ESURANCE INS CO NORTHERN ASSURANCE CO OF AMERICA ONEBEACON AMERICA INS CO ONEBEACON INS CO ONEBEACON MIDWEST INS CO PENNSYLVANIA GENERAL INS CO	0.30	95	167	298	560	317.095

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
40	AMERICAN INTL GROUP AIG CENTENNIAL INS CO AIG INDEMNITY INS CO AIG NATIONAL INS CO AIG PREFERRED INS CO AIG PREMIER INS CO AIU INS CO AMERICAN HOME ASR CO AMERICAN INTERNATIONAL INS CO BIRMINGHAM FIRE INS CO OF PA COMMERCE & INDUSTRY INS CO GRANITE STATE INS CO ILLINOIS NATIONAL INS CO INS CO OF THE STATE OF PA LANDMARK INS CO NATIONAL UNION FIRE INS CO OF PITTSB NEW HAMPSHIRE INDEMNITY CO INC NEW HAMPSHIRE INS CO	0.36	95	170	322	587	266.009
41	HANNOVER GROUP CLARENDON NATIONAL INS CO REDLAND INSURANCE COMPANY	0.56	21	39	76	136	37.388
42	CREDIT SUISSE GROUP BLUE RIDGE INDEMNITY BLUE RIDGE INS CO	0.84	9	3	14	26	10.749

Rank	Companies or Groups with 10 or More Complaints or \$10,000,000 in Average Annual PP-Auto Premiums	Complaint Ratio (Column I / Column V)	I Upheld	II Questions of Fact	III Not Upheld or Withdrawn	IV Company Total	V Average of 2004 and 2005 PP-Auto Premiums Written Directly in NYS (In Millions)
43	INFINITY PROP & CAS INS GRP AMERICAN DEPOSIT INSURANCE COMPANY ATLANTA CASUALTY CO ATLANTA SPECIALTY INS CO INFINITY INSURANCE COMPANY INFINITY SELECT INSURANCE CO. LEADER INS CO REGAL INS. CO. TICO INS CO WINDSOR INS CO	1.31	19	8	36	63	14.522
44	TRI-STATE CONSUMER INS CO	1.39	33	38	43	114	23.743
45	LONG ISLAND INSURANCE COMPANY	8.24	42	13	56	111	5.096
	Subtotal (Including only companies in the ranking)	0.14	1486	2925	5015	9426	10367.018
	Grand Total	0.15	1600	3045	5294	9939	10485.893

Footnotes :

- a Each group name is followed by the names of all member companies contributing to the group's total premiums. If only one company accounts for all the premium volume, the group name is not listed.
- b A question of fact does not necessarily indicate fault lies with either the insurance company or the complainant. It indicates a matter of dispute beyond the authority of the Insurance Department to resolve. Such disputes are best left to a court of competent jurisdiction. This category also includes actions in litigation and arbitration. Complaints in this column were not used to calculate complaint ratios.
- c These complaints are not included in the ratio because they were not upheld by the Insurance Department or were withdrawn by the complainant. This category also includes various other “not upheld” complaints.

TECHNICAL NOTES

Data Limitations

When examining complaint ratios, the following limitations should be considered:

1. Using only premium volume as the complaint ratio's base will overstate the ratios for companies having lower premium rates (*i.e.*, the fraction has a smaller denominator and therefore produces a higher ratio). Conversely, using premium volume will understate the ratios for companies with higher premiums (*i.e.*, the higher denominator produces a lower ratio).
2. All complaints are considered of equal importance. Thus, a physical damage complaint involving a small sum has the same weight as a complaint involving a \$300,000 bodily injury claim.
3. Small variations in complaint totals can at times result in large fluctuations in the relative standings--especially for companies with low premium volume.
4. Insurers are ranked by group, not by company. Individual insurers within these groups may have a better or worse complaint ratio than the group. There were 230 individual insurance companies that qualified for inclusion in the ranking. The 230 individual insurers are listed alphabetically in the index beginning on page 21.
5. Insurance companies or groups with identical complaint ratios are ranked by size of premium. For example, if two insurers had 0.00 complaint ratios, the company with the most premium would be ranked first. (Please note that complaint ratios above 0.00 may appear identical in this report, but seldom are. This is because complaint ratios are shown to two decimal places in the report, but are ranked based on their *unrounded* ratios.)

Index of Private Passenger Auto Insurance Companies by Group Affiliation and Ranking

<u>Company</u>	<u>Group</u>	<u>Rank</u>
A. CENTRAL INSURANCE COMPANY	CENTRAL SERVICES GRP	11
AIG CENTENNIAL INS CO	AMERICAN INTL GROUP	40
AIG INDEMNITY INS CO	AMERICAN INTL GROUP	40
AIG NATIONAL INS CO	AMERICAN INTL GROUP	40
AIG PREFERRED INS CO	AMERICAN INTL GROUP	40
AIG PREMIER INS CO	AMERICAN INTL GROUP	40
AIU INS CO	AMERICAN INTL GROUP	40
ALLMERICA FINANCIAL ALLIANCE INS. CO.	ALLMERICA FINANCIAL CORP	33
ALLSTATE INDEMNITY CO	ALLSTATE INS. GROUP	26
ALLSTATE INS CO	ALLSTATE INS. GROUP	26
AMERICAN AUTOMOBILE INS CO	ALLIANZ INS. GROUP	29
AMERICAN CASUALTY CO OF READING PA	CNA INSURANCE GROUP	30
AMERICAN CENTRAL INS CO	WHITE MOUNTAINS GRP	39
AMERICAN DEPOSIT INSURANCE COMPANY	INFINITY PROP & CAS INS GRP	43
AMERICAN EMPLOYERS INS CO	WHITE MOUNTAINS GRP	39
AMERICAN FAMILY HOME INS CO	AMERICAN MODERN INS GRP	25
AMERICAN HOME ASR CO	AMERICAN INTL GROUP	40
AMERICAN INS CO	ALLIANZ INS. GROUP	29
AMERICAN INTERNATIONAL INS CO	AMERICAN INTL GROUP	40
AMERICAN MODERN HOME INS CO	AMERICAN MODERN INS GRP	25
AMERICAN STATES INS CO	SAFECO INS GRP	38
AMEX ASSURANCE COMPANY	AMERICAN EXPRESS GRP	24
AMICA MUTUAL INS CO	AMICA MUTUAL GRP	4
ASSOCIATED INDEMNITY CORP	ALLIANZ INS. GROUP	29
ASSURANCE COMPANY OF AMERICA	ZURICH INS GROUP	37
ATLANTA CASUALTY CO	INFINITY PROP & CAS INS GRP	43
ATLANTA SPECIALTY INS CO	INFINITY PROP & CAS INS GRP	43
ATLANTIC MUTUAL INS CO	ATLANTIC COMPANIES	1
AUTO ONE INS CO	WHITE MOUNTAINS GRP	39
AUTOMOBILE INS CO OF HARTFORD CT	ST PAUL TRAVELERS GRP	27
AUTOONE SELECT INSURANCE COMPANY	WHITE MOUNTAINS GRP	39
BIRMINGHAM FIRE INS CO OF PA	AMERICAN INTL GROUP	40
BLUE RIDGE INDEMNITY	CREDIT SUISSE GROUP	42
BLUE RIDGE INS CO	CREDIT SUISSE GROUP	42
BUCKEYE UNION INS CO	CNA INSURANCE GROUP	30
CENTENNIAL INS CO	ATLANTIC COMPANIES	1
CHARTER OAK FIRE INS CO	ST PAUL TRAVELERS GRP	27
CHUBB INDEMNITY INS CO	CHUBB & SON INC	14
CIM INS CORP	GMAC INS HOLDING	19
CITIZENS INS CO OF AMERICA	ALLMERICA FINANCIAL CORP	33
CLARENDON NATIONAL INS CO	HANNOVER GROUP	41
COMMERCE & INDUSTRY INS CO	AMERICAN INTL GROUP	40
CONTINENTAL CASUALTY CO	CNA INSURANCE GROUP	30
CONTINENTAL INS CO	CNA INSURANCE GROUP	30
COUNTRYWIDE INS CO	*	15
DEERBROOK INS. CO.	ALLSTATE INS. GROUP	26
ECONOMY PREMIER ASSURANCE COMPANY	METROPOLITAN GROUP	28
ELECTRIC INS CO	ELECTRIC INS GRP	9
EMPLOYERS FIRE INS CO	WHITE MOUNTAINS GRP	39
ENCOMPASS HOME AND AUTO INSURANCE CO	CNA INSURANCE GROUP	30
ENCOMPASS INDEMNITY CO	ALLSTATE INS. GROUP	26
ENCOMPASS INDEPENDENT INSURANCE COMPANY	CNA INSURANCE GROUP	30
ENCOMPASS INSURANCE CO OF AMERICA	CNA INSURANCE GROUP	30
ENCOMPASS PROPERTY AND CASUALTY CO	CNA INSURANCE GROUP	30
ERIE INS CO	ERIE INS GRP	6
ERIE INS CO OF NY	ERIE INS GRP	6
ESURANCE INS CO	WHITE MOUNTAINS GRP	39
EVEREADY INS CO	*	2
EXCELSIOR INS CO	LIBERTY MUTUAL GRP	13
FARM FAMILY CASUALTY INS CO	AMERICAN NATIONAL FINANCIAL GRP	35
FARMERS NEW CENTURY INS CO	ZURICH INS GROUP	37
FARMINGTON CASUALTY CO	ST PAUL TRAVELERS GRP	27

FEDERAL INS CO	CHUBB & SON INC	14
FIDELITY & CASUALTY CO OF NY	CNA INSURANCE GROUP	30
FIREMAN'S FUND INS CO	ALLIANZ INS. GROUP	29
FIREMAN'S FUND INS CO OF WI	ALLIANZ INS. GROUP	29
FIREMEN'S INS CO OF NEWARK NJ	CNA INSURANCE GROUP	30
FIRST LIBERTY INS CORP	LIBERTY MUTUAL GRP	13
FIRST NATIONAL INSURANCE COMPANY OF AMERICA	SAFECO INS GRP	38
FOREMOST INS CO	ZURICH INS GROUP	37
FOREMOST PROPERTY & CASUALTY INS CO	ZURICH INS GROUP	37
GEICO CASUALTY CO	BERKSHIRE-HATHAWAY	34
GEICO GENERAL INS CO	BERKSHIRE-HATHAWAY	34
GEICO INDEMNITY CO	BERKSHIRE-HATHAWAY	34
GENERAL INS CO OF AMERICA	SAFECO INS GRP	38
GLENS FALLS INS CO	CNA INSURANCE GROUP	30
GOVERNMENT EMPLOYEES INS CO	BERKSHIRE-HATHAWAY	34
GRANITE STATE INS CO	AMERICAN INTL GROUP	40
GRAPHIC ARTS MUTUAL INS CO	UTICA NATIONAL INS GROUP	31
GREAT NORTHERN INS CO	CHUBB & SON INC	14
HANOVER INS CO	ALLMERICA FINANCIAL CORP	33
HARLEYSVILLE INS CO OF NY	HARLEYSVILLE GROUP	16
HARLEYSVILLE WORCESTER INS CO	HARLEYSVILLE GROUP	16
HARTFORD ACCIDENT & INDEMNITY CO	HARTFORD F & C GROUP	22
HARTFORD CASUALTY INS CO	HARTFORD F & C GROUP	22
HARTFORD FIRE INS CO	HARTFORD F & C GROUP	22
HARTFORD INS CO OF THE MIDWEST	HARTFORD F & C GROUP	22
HARTFORD INSURANCE COMPANY OF ILLINOIS	HARTFORD F & C GROUP	22
HARTFORD UNDERWRITERS INS CO	HARTFORD F & C GROUP	22
HUDSON INS CO	FAIRFAX FINANCIAL GRP	3
ILLINOIS NATIONAL INS CO	AMERICAN INTL GROUP	40
INFINITY INSURANCE COMPANY	INFINITY PROP & CAS INS GRP	43
INFINITY SELECT INSURANCE CO.	INFINITY PROP & CAS INS GRP	43
INS CO OF THE STATE OF PA	AMERICAN INTL GROUP	40
INTEGON CASUALTY INS CO	GMAC INS HOLDING	19
INTEGON NATIONAL INS CO	GMAC INS HOLDING	19
INTEGON PREFERRED INS CO	GMAC INS HOLDING	19
INTERBORO MUTUAL INDEMNITY INS CO	*	32
KANSAS CITY FIRE & MARINE INS CO	CNA INSURANCE GROUP	30
KEMPER INDEPENDENCE INSURANCE COMPANY	UNITRIN GRP	18
LANDMARK INS CO	AMERICAN INTL GROUP	40
LEADER INS CO	INFINITY PROP & CAS INS GRP	43
LIBERTY INS CORP	LIBERTY MUTUAL GRP	13
LIBERTY MUTUAL FIRE INS CO	LIBERTY MUTUAL GRP	13
LIBERTY MUTUAL INS CO	LIBERTY MUTUAL GRP	13
LM GENERAL INS CO	LIBERTY MUTUAL GRP	13
LM P & C INS CO	LIBERTY MUTUAL GRP	13
LM PERSONAL INS CO	LIBERTY MUTUAL GRP	13
LONG ISLAND INSURANCE COMPANY	*	45
MAIN STREET AMERICA ASSURANCE CO	NATL GRANGE MUT INS GRP	23
MARYLAND CASUALTY CO	ZURICH INS GROUP	37
MASSACHUSETTS BAY INS CO	ALLMERICA FINANCIAL CORP	33
MERCHANTS INS CO OF NH INC	MERCHANTS MUTUAL	8
MERCHANTS MUTUAL INS CO	MERCHANTS MUTUAL	8
MERCURY CASUALTY COMPANY	MERCURY GENERAL GRP	20
METROPOLITAN CASUALTY INS CO	METROPOLITAN GROUP	28
METROPOLITAN GENERAL INS CO	METROPOLITAN GROUP	28
METROPOLITAN GROUP PROPERTY AND CASUALTY INS CO	METROPOLITAN GROUP	28
METROPOLITAN PROPERTY & CASUALTY INS CO	METROPOLITAN GROUP	28
MIC PROPERTY & CASUALTY INS CORP	GMAC INS HOLDING	19
MOTORS INS CORP	GMAC INS HOLDING	19
NATIONAL BEN FRANKLIN INS CO OF IL	CNA INSURANCE GROUP	30
NATIONAL CONTINENTAL INS CO	PROGRESSIVE INS. GROUP	10
NATIONAL FIRE INS CO OF HARTFORD	CNA INSURANCE GROUP	30
NATIONAL GENERAL INS CO	GMAC INS HOLDING	19
NATIONAL GRANGE MUTUAL INS CO	NATL GRANGE MUT INS GRP	23
NATIONAL SURETY CORP	ALLIANZ INS. GROUP	29
NATIONAL UNION FIRE INS CO OF PITTSB	AMERICAN INTL GROUP	40
NATIONWIDE ASSURANCE CO	NATIONWIDE GROUP	21

NATIONWIDE GENERAL INS CO	NATIONWIDE GROUP	21
NATIONWIDE INSURANCE COMPANY OF AMERICA	NATIONWIDE GROUP	21
NATIONWIDE MUTUAL FIRE INS CO	NATIONWIDE GROUP	21
NATIONWIDE MUTUAL INS CO	NATIONWIDE GROUP	21
NATIONWIDE PROPERTY & CAS INS CO	NATIONWIDE GROUP	21
NETHERLANDS INS CO	LIBERTY MUTUAL GRP	13
NEW HAMPSHIRE INDEMNITY CO INC	AMERICAN INTL GROUP	40
NEW HAMPSHIRE INS CO	AMERICAN INTL GROUP	40
NEW SOUTH INS CO	GMAC INS HOLDING	19
NEW YORK CENTRAL MUTUAL FIRE INS CO	CENTRAL SERVICES GRP	11
NORTHERN ASSURANCE CO OF AMERICA	WHITE MOUNTAINS GRP	39
NORTHERN INS CO OF NY	ZURICH INS GROUP	37
ONEBEACON AMERICA INS CO	WHITE MOUNTAINS GRP	39
ONEBEACON INS CO	WHITE MOUNTAINS GRP	39
ONEBEACON MIDWEST INS CO	WHITE MOUNTAINS GRP	39
PACIFIC INDEMNITY CO	CHUBB & SON INC	14
PEERLESS INS CO	LIBERTY MUTUAL GRP	13
PENNSYLVANIA GENERAL INS CO	WHITE MOUNTAINS GRP	39
PHOENIX INSURANCE CO	ST PAUL TRAVELERS GRP	27
PREFERRED MUTUAL INS CO	*	7
PROGRESSIVE CAS INS CO	PROGRESSIVE INS. GROUP	10
PROGRESSIVE HALCYON INS CO	PROGRESSIVE INS. GROUP	10
PROGRESSIVE NORTHEASTERN INS CO	PROGRESSIVE INS. GROUP	10
PROGRESSIVE NORTHERN INS. CO.	PROGRESSIVE INS. GROUP	10
PROGRESSIVE NORTHWESTERN INSURANCE CO.	PROGRESSIVE INS. GROUP	10
PROGRESSIVE SPECIALTY INS CO	PROGRESSIVE INS. GROUP	10
PROPERTY AND CASUALTY INS. CO. OF HARTFORD	HARTFORD F & C GROUP	22
REDLAND INSURANCE COMPANY	HANNOVER GROUP	41
REGAL INS. CO.	INFINITY PROP & CAS INS GRP	43
REPUBLIC-FRANKLIN INS CO	UTICA NATIONAL INS GROUP	31
RESPONSE INDEMNITY CO	RESPONSE INS GROUP	5
RESPONSE INDEMNITY COMPANY OF DELAWARE	RESPONSE INS GROUP	5
RESPONSE INS CO	RESPONSE INS GROUP	5
RESPONSE WORLDWIDE DIRECT AUTO INS CO	RESPONSE INS GROUP	5
RESPONSE WORLDWIDE INS CO	RESPONSE INS GROUP	5
SAFECO INS CO OF AMERICA	SAFECO INS GRP	38
SAFECO INS CO OF INDIANA	SAFECO INS GRP	38
SAFECO NATIONAL INS CO	SAFECO INS GRP	38
SENTINEL INSURANCE COMPANY	HARTFORD F & C GROUP	22
STANDARD FIRE INS CO	ST PAUL TRAVELERS GRP	27
STATE FARM FIRE AND CAS CO	STATE FARM IL	12
STATE FARM MUTUAL AUTOMOBILE INS CO	STATE FARM IL	12
STATE-WIDE INS CO	*	36
TICO INS CO	INFINITY PROP & CAS INS GRP	43
TIG INS CO	FAIRFAX FINANCIAL GRP	3
TITAN INDEMNITY COMPANY	NATIONWIDE GROUP	21
TRANSPORTATION INS CO	CNA INSURANCE GROUP	30
TRAVCO INSURANCE CO.	ST PAUL TRAVELERS GRP	27
TRAVELERS CAS CO OF CONN	ST PAUL TRAVELERS GRP	27
TRAVELERS COMMERCIAL INS CO	ST PAUL TRAVELERS GRP	27
TRAVELERS HOME AND MARINE INSURANCE CO.	ST PAUL TRAVELERS GRP	27
TRAVELERS INDEMNITY CO	ST PAUL TRAVELERS GRP	27
TRAVELERS INDEMNITY CO OF AMERICA	ST PAUL TRAVELERS GRP	27
TRAVELERS INDEMNITY CO. OF CT	ST PAUL TRAVELERS GRP	27
TRAVELERS PROP CAS CO OF AM	ST PAUL TRAVELERS GRP	27
TRAVELERS PROP CAS INS CO	ST PAUL TRAVELERS GRP	27
TRI-STATE CONSUMER INS CO	*	44
TRUMBULL INSURANCE COMPANY	HARTFORD F & C GROUP	22
TWIN CITY FIRE INS CO	HARTFORD F & C GROUP	22
UNITED FINANCIAL CASUALTY INS CO	PROGRESSIVE INS. GROUP	10
UNITED SERVICES AUTOMOBILE ASN	UNITED SERVICES AUTOMOBILE ASN GRP	17
UNITRIN ADVANTAGE INS CO	UNITRIN GRP	18
UNITRIN AUTO & HOME INS CO	UNITRIN GRP	18
UNITRIN DIRECT INSURANCE COMPANY	UNITRIN GRP	18
UNITRIN DIRECT P & C CO	UNITRIN GRP	18
UNITRIN PREFERRED INS CO	UNITRIN GRP	18
UNIVERSAL UNDERWRITERS INS CO	ZURICH INS GROUP	37
USAA CAS INS CO	UNITED SERVICES AUTOMOBILE ASN GRP	17
USAA GENERAL INDEMNITY CO	UNITED SERVICES AUTOMOBILE ASN GRP	17

UTICA MUTUAL INS CO	UTICA NATIONAL INS GROUP	31
UTICA NATIONAL INS CO OF TX	UTICA NATIONAL INS GROUP	31
UTICA NATL ASSUR CO	UTICA NATIONAL INS GROUP	31
VALIANT INS CO	ZURICH INS GROUP	37
VALLEY FORGE	CNA INSURANCE GROUP	30
VICTORIA FIRE & CASUALTY CO	NATIONWIDE GROUP	21
VICTORIA NATIONAL INS. CO.	NATIONWIDE GROUP	21
VICTORIA SELECT INS. CO.	NATIONWIDE GROUP	21
VIGILANT INS CO	CHUBB & SON INC	14
WARNER INS CO	RESPONSE INS GROUP	5
WINDSOR INS CO	INFINITY PROP & CAS INS GRP	43