BEFORE THE INSURANCE DEPARTMENT OF THE COMMONWEALTH OF PENNSYLVANIA

Statement Regarding the Acquisition of Control of or Merger with Domestic Insurers:

Highmark Inc.; First Priority Life Insurance Company, Inc.;
Gateway Health Plan, Inc.; Highmark Casualty Insurance Company;
Highmark Senior Resources Inc.; HM Casualty Insurance Company;
HM Health Insurance Company, d/b/a Highmark Health Insurance Company;
HM Life Insurance Company; HMO of Northeastern Pennsylvania, Inc.,
d/b/a First Priority Health; Inter-County Health Plan, Inc.;
Inter-County Hospitalization Plan, Inc.; Keystone Health Plan West, Inc.;
United Concordia Companies, Inc.; United Concordia Dental Plans of Pennsylvania, Inc.;
United Concordia Life and Health Insurance Company

By UPE, a Pennsylvania nonprofit corporation

SUPPLEMENTAL RESPONSE TO PID INFORMATION REQUEST 4.2.13 FROM THE PENNSYLVANIA INSURANCE DEPARTMENT

REQUEST 4.2.13:

Provide a listing of all insurance product lines, by geographic area, offered by Highmark or any Highmark Affiliate, both which are and which are not the subject of the Form A filing. For each product line, identify whether the product line is Blue-branded or unbranded. Please describe if any of such insurance lines were not considered for the purpose of the analysis under 40 P.S. § 991.1403(d)(i) and, if not, why not.

SUPPLEMENTAL REQUEST 4.2.13 (via letter from PID dated March 27, 2012).

- B. The Response "we understand" is not a direct and complete answer to the Request.
- C. The Response does not describe if any such insurance lines were not considered for the purpose of the analysis under 40 P.S. § 991.1403(d)(i) and, if not, why not.
- D. Action Required:
 - (1) UPE or Highmark must make affirmative statements in the Response as if such statements were provided in a Form A filing that is filed pursuant to section 1402 of the Act (40 P.S. § 991.1402);

(2) Please describe if any such insurance lines were not considered for the purpose of the analysis under 40 P.S. § 991.1403(d)(i) and if not, why not.

RESPONSE TO SUPPLEMENTAL REQUEST:

Insurance product lines offered by Highmark or any Highmark Affiliate are those lines provided in the Response to Request 4.2.13.

Although UPE does not believe that an analysis under 40 P.S. § 991.1403 is required, UPE is preparing such an analysis at the request of the Department. The analysis will consider those product lines offered in the 29-county area comprising the Western Pennsylvania service area of Highmark Blue Cross because this 29-county service area is the relevant geographic area for such an analysis. Product lines offered only outside that area are not considered in the Section 1403 analysis.

UPE 120 Fifth Avenue Pittsburgh, PA 15222