BEFORE THE INSURANCE DEPARTMENT OF THE COMMONWEALTH OF PENNSYLVANIA

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

Hospital Service Association of Northeastern Pennsylvania d/b/a Blue Cross of Northeastern Pennsylvania; First Priority Life Insurance Company, Inc.; HMO of Northeastern Pennsylvania, Inc., d/b/a First Priority Health

By Highmark Inc.

BCNEPA RESPONSE TO INFORMATION REQUEST 5.2.14.1 FROM THE PENNSYLVANIA INSURANCE DEPARTMENT

REQUEST 5.2.14.1:

Provide any Documents, including studies, projections, estimates, evaluations, analysis, reports, discussions or other communications relating to actual or potential barriers to entry in any of the markets identified in response to Section 5.2.11.

RESPONSE:

BCNEPA certifies to the best of its information, knowledge and belief the following: BCNEPA does not have any Documents relating to actual or potential barriers to entry in any of the markets identified in response to Section 5.2.11.

Hospital Service Association of Northeastern Pennsylvania d/b/a Blue Cross of Northeastern Pennsylvania ("BCNEPA") 19 North Main Street Wilkes-Barre, PA 18711