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March 7, 2013

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Corporate & Financial Regulation

MAR 07 2013

Stephen J. Johnson, Deputy Insurance Commissioner  
Office of Corporate and Financial Regulation  
Pennsylvania Insurance Department  
1345 Strawberry Square  
Harrisburg, PA 17120

**Pennsylvania**  
**Insurance Department**

**Re: Request for Exemption from a Form A (Statement Regarding the Acquisition of Control Of or Merger With a Domestic Insurer) Filing For The Mergers of Traders & General Insurance Company (NAIC No. 38857), Houston General Insurance Company (NAIC No. 38849), and The Camden Fire Insurance Association (NAIC No. 21946) With and Into OneBeacon Insurance Company (NAIC No. 21970)**

Dear Mr. Johnson:

This letter is a request for exemptions from the Form A filing requirements pursuant to the provisions of 40 P.S. §991.1402(g)(1) for the following three mergers as transactions not being made or entered into for the purpose of and not having the effect of changing or influencing the control of OneBeacon Insurance Company, a Pennsylvania domestic insurance company.

The transactions would involve the following simultaneous or nearly simultaneous mergers: (1) Houston General Insurance Company (HGIC), a Texas stock property and casualty insurance company the sole stockholder of which is OneBeacon Insurance Company, will merge with and into OneBeacon Insurance Company; (2) Traders & General Insurance Company (T&G), a Texas stock property and casualty insurance company the sole stockholder of which is OneBeacon Insurance Company, will merge with and into OneBeacon Insurance Company; and (3) The Camden Fire Insurance Association (CFIA), a New Jersey stock property and casualty insurance company the sole stockholder of which is OneBeacon Insurance Company, will merge with and into OneBeacon Insurance Company. OneBeacon Insurance Company, a Pennsylvania domestic stock insurance company, will be the surviving corporation in each of these three

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mergers. Consequently, these mergers will result in HGIC, T&G and CFIA being merged out of existence.

Enclosed with this filing are Pre-Merger and Post-Merger Organization Charts and a check in the amount of \$7,500 for the \$2,500 filing fee for each of the three exemption requests.

Corresponding filings on the proposed mergers are being made as required with the Texas Department of Insurance and New Jersey Department of Banking and Insurance.

We respectfully request the grant of exemptions pursuant to 40 P.S. §991.1402(g)(1) as soon as possible. Please feel free to contact me if you have any questions or require additional information.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Fran Roggenbaum".

Fran Roggenbaum

Enclosures

Cc w/ Enclosures: Virginia A. McCarthy, Associate General Counsel  
OneBeacon Insurance Group