



January 2, 2019

Ms. Carla Whitehurst  
SVP, Associate General Counsel  
XL Bermuda Ltd.  
O'Hara House  
One Bermudiana Road  
Hamilton Bermuda HM08

**Via E-mail:** [Carla.Whitehurst@axaxl.com](mailto:Carla.Whitehurst@axaxl.com)

**RE: Application for 2019 Designation as a Certified Reinsurer – XL Bermuda Ltd**

Dear Ms. Whitehurst:

The Pennsylvania Insurance Department ("Department") has completed its review of the application referenced above, filed pursuant to 31 Pa. Code § 161.3a, and dated November 19, 2018. XL Bermuda Ltd ("Company") is domiciled and licensed in Bermuda. Our review of the submission has resulted in the following determination:

- Pursuant to 31 Pa. Code § 161.3a(c), if an applicant for certification has been certified as a reinsurer in an NAIC accredited jurisdiction, the Commissioner has the discretion to defer to that jurisdiction's certification, and has the discretion to defer to the rating assigned by that jurisdiction.
- New York is an accredited jurisdiction and also serves as the lead U.S. insurance regulator of the Company. The New York Department of Financial Services approved the Company as a certified reinsurer eligible for collateral reduction effective January 1, 2019 through December 31, 2019, with a rating as a Secure-3 (20%) reinsurer.
- Notice of receipt of the filing was published in the *Pennsylvania Bulletin* with a 30-day comment period. No public comments were received during the comment period.
- The Department hereby designates the Company as a certified reinsurer eligible for collateral reduction effective January 1, 2019 through December 31, 2019, with a rating as a Secure-3 (20%) reinsurer.

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- The Company's designation as a certified reinsurer and its rating are conditioned upon the Company being domiciled and licensed in a qualified jurisdiction pursuant to 31 Pa. Code § 161.3a(a)(1). The Company is domiciled and licensed in Bermuda and Bermuda is a qualified jurisdiction.
- The Company's status for collateral reduction is contingent upon it maintaining full compliance with all of the provisions contained 31 Pa. Code § 161.3a, including but not limited to, submitting the annual renewal application for rating. The annual renewal application for passporting to Pennsylvania should not be submitted until the lead US regulator has issued its approval of the renewal as a certified reinsurer and ReFAWG has reviewed and concurred.

If you have any questions, please do not hesitate to contact me at (717) 783-6409 or [krankin@pa.gov](mailto:krankin@pa.gov).

Sincerely,



Kimberly A. Rankin, Director  
Company Licensing & Financial Analysis