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**Bybee, Cressinda**

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**From:** Chronister, Ronald [ronald.chronister@bipc.com]  
**Sent:** Friday, December 30, 2011 9:51 AM  
**To:** Bybee, Cressinda  
**Cc:** pbennett@usrealtyadvisors.com  
**Subject:** Response to Comment of Patricia Bennett  
**Attachments:** Bennett Response.pdf

Ms. Bybee: I am attaching a response from UPE to the comment submitted to the Insurance Department by Patricia Bennett. I am also copying Ms. Bennett with the response at the email address listed in her comment

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**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; Intercounty Health Plan, Inc.;  
Intercounty 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

**Response of UPE to  
Comment of Patricia Bennett, Dated November 14, 2011**

UPE is responding to the comment from Patricia Bennett, Vice President/ Asset  
Manager, U.S. Realty Advisors, LLC, dated November 14, 2011. The comment is  
numbered as Document 0048 on the Highmark/ West Penn Cumulative Log page of the  
Pennsylvania Insurance Department website.

Ms. Bennett's organization, U.S. Realty Advisors, LLC represents the landlord of  
a property that is currently leased to WPAHS. In her letter, Ms. Bennett requests that the  
specific documents within the Form A filing pertaining to the property lease be identified  
so that she may understand how the anticipated relationship will affect her client.

In response to Ms. Bennett's inquiry, UPE would like to direct her to Section 2.8  
of the Affiliation Agreement. This document explicitly states that there will be no  
changes to the financial obligations of West Penn Allegheny Health System ("WPAHS")  
and that all assets and liabilities will continue to be owned by, and be obligations of,  
WPAHS.

UPE would like to thank Ms. Bennett for her inquiry.

**UPE**  
120 Fifth Avenue  
Pittsburgh, PA 15222

DATE: December 30, 2011

cc: Patricia Bennett