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Corporate & Financial Regulation
OCT 17 2012
Pennsylvania
Insurance Department

UPE
120 Fifth Avenue
Pittsburgh, PA 15222
(412) 544-8529

Edward A. Bittner, Jr.

October 17, 2012

Robert Brackbill, Jr.
Chief, Company Licensing Division
Bureau of Company Licensing and Financial Analysis
Office of Corporate and Financial Regulation
Pennsylvania Insurance Department
13th Floor, Strawberry Square
Harrisburg, PA 17120

Re: UPE Confidential Responses to Information Requests

Dear Mr. Brackbill:

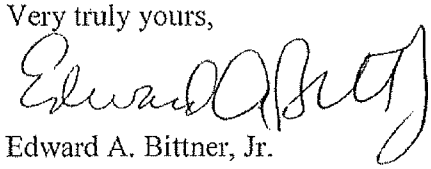
Attached please find supplemental confidential Responses to Information Request numbers 2.2.2, 3.5, 4.2, 4.2.1.1-4.2.1.2 A-F, 4.2.1.3-4.2.1.4 and 4.2.1.5, 4.2.2, 4.2.3, 4.2.6.1-4.2.6.8, 4.2.7, 4.2.11 and 4.2.12, 4.3.2, and 4.6.1.

The documents/information contained in the filings referenced above which are designated as confidential documents/information, confidential proprietary information or trade secret information should be maintained as confidential and should not be made available for public inspection or copying (1) because the documents/information contain commercial or financial information maintained as confidential or privileged which consists of the types of information referenced in the various Department Protocols, statutes and regulations including the Insurance Holding Companies Act, 40 P.S. §§ 991.1401 *et seq.,* the regulations under 31 Pa. Code Chapter 25, as well as the provisions of 65 P.S. §67.101 *et seq.*, including but not limited to §67.102 and § 67.708, including but not limited to, subsections (b)(6)(i), (b)(10)(i), (b)(11), and (b)(17) as being of a sensitive, confidential proprietary and/or trade secret nature, the disclosure of which would cause substantial material harm to the competitive position of UPE and/or Highmark and/or one or more of their affiliates, or where a filing has been made by West Penn Allegheny Health System to the competitive position of West Penn Allegheny Health System or one or more of its affiliates, including material losses to one or more of such companies and/or (2) because the information falls within the definition of "trade secret," including information in the form of one or more compilations, techniques or processes that derive independent economic value from not being generally known and not being readily ascertainable by proper means by other persons who can obtain economic value from disclosure or use and which is the subject of reasonable efforts to maintain secrecy/confidentiality.

16

Please refer to the Confidentiality Notice and each Confidential Response for additional information relating to UPE's, Highmark's, or West Penn Allegheny Health System's assertion of confidentiality regarding certain Responses. If you need additional information, please advise us accordingly.

Very truly yours,



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