

November 3, 2011

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

In re: Section 2502(a)(2) of the Insurance Company Law of 1921 ("section 2502(a)(2)")

Dear Deputy Commissioner Johnson,

As required by section 2502(a)(2), Vision Benefits of America, Inc. (the "Insurer") hereby discloses to the Pennsylvania Insurance Department that none of the officers, directors, and employees of the Insurer have reported that they have served during 2011 on the board of directors of any hospital or other health care facility as those terms are defined in section 802.1 of the Health Care Facilities Act or on the board of an entity that owns, operates or manages a hospital or other health care facility.

Please feel free to contact me with any questions.

Sincerely,

Michael S. Gissin President/CEO

MSG:dds