Exhibit 32
As Filed

DELAWARE COMPENSATION RATING BUREAU, INC.

NCCI Filing Memorandum

Attached is an NCCI Filing Memorandum (ITEM R-1385-2003 UPDATE TO RETROSPECTIVE RATING PLAN PARAMETERS).

The DCRB is filing the Table of Expected Loss Ranges as shown on page 4 of ITEM R-1385.

FILING MEMORANDUM

ITEM R-1385—2003 UPDATE TO RETROSPECTIVE RATING PLAN PARAMETERS

(To be effective 12:01 a.m. on December 1, 2003, applicable to new and renewal business only.)

PURPOSE

The purpose of this item is to update the Expected Loss Ranges and State Hazard Group Relativities in the ***Retrospective Rating Plan Manual for Workers Compensation and Employers Liability Insurance.***

BACKGROUND

Retrospective Rating is a plan for adjusting the risk premium of a policy according to the loss experience during the effective period of the policy. At the simplest level, an insured's retrospective premium is determined by the formula **R = (B + cL)t,** where

R = Retrospective Premium, subject to minimum and maximum amounts
B = Basic Premium
c = Loss Conversion Factor, generally reflecting loss adjustment expense
L = Actual Incurred Loss during the effective policy period
t = Tax Multiplier

The retrospective premium, R, is not known until after the policy has expired and the actual losses are fully developed.

The basic premium contains provisions for the expenses of the carriers. It also includes a net insurance charge, which contains a charge to compensate for the possibility that R will exceed the maximum premium amount. Similarly, there is a savings resulting from the possibility that R will be less than the minimum premium amount. The net insurance charge is the difference between the charge for the maximum and the savings from the minimum.

Expected Loss Ranges

The Table of Insurance Charges contains the excess ratios needed to quantify the insurance charge and savings described above. The ratio of actual losses to expected losses, the entry ratio, is used to look up the values in the Table. The charges depend not only on the maximum and minimum subject losses, but also on the size of the insured. The variation in the loss ratios, hence the charges, of the larger employers that expect many losses should be much lower than the variation for smaller employers.

As inflation increases claim size, there is an apparent growth in the size of the insured, measured in expected losses, but no *real* growth in the size of the insured, measured in the expected number of claims. To correct for the impact of loss size inflation, NCCI is proposing that the Table of Expected Loss Ranges be updated for the trend in average size of loss. The last time such an update was made was in 2001 (Item R-1371—2001 Update to Retrospective Rating Plan Parameters). The current Table of Expected Loss Ranges is based on a projected annual increase in severity of 2% from August 5, 1997 to July 1, 2002. We have since observed an actual annual growth in severity of 6.8% from August 5, 1997 to January 14, 2000, and we project an annual growth in severity of 5% from January 14, 2000 to December 1, 2004. The new table incorporates both these observed and projected changes in severity.

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State Hazard Group Relativities
The variation in the loss ratios of employers in the lower hazard groups should be smaller than the variation for employers in the higher hazard groups. The State Hazard Group Relativity Factors adjust for this difference by placing lower hazard group employers in a higher Expected Loss Size Range and higher hazard group employers in a lower Expected Loss Size Range than would otherwise be the case. This adjustment affects the column selection in the Table of Insurance Charges, which then impacts the basic premium portion of the retrospective policy premium.

The State Hazard Group Relativities should be updated regularly due to changes in the circumstances (changes in state statutory benefit levels, inflation, etc.) underlying each state's severity.

PROPOSAL

It is proposed that the Retrospective Rating Plan be amended as contained in the attached exhibits.

Expected Loss Ranges
This filing updates the Table of Expected Loss Ranges for entry into the Table of Insurance Charges. The proposed ranges are found in Exhibit 2.

State Hazard Group Relativities
This filing also updates the State Hazard Group Relativities of the Retrospective Rating Plan for each state. Exhibit 1 provides a description of the development of the relativities. As explained in the exhibit, individual state severities, as well as countrywide severities, are used in the calculation of the relativities.

The proposed relativities are found in Exhibit 3.

IMPACT

Expected Loss Ranges
The proposed Expected Loss Ranges are necessary to maintain the aggregate expected balance between the retrospectively rated premium and the guaranteed cost premium. If these ranges were not updated, there would be a natural slippage caused by inflation over time because risks would have an apparent growth in size as seen by increasing expected losses, but no real growth in size as seen by their expected number of claims.

State Hazard Group Relativities
Retrospective rating should produce premium that is equitably distributed to all insured employers, but on average close to the guaranteed cost in the approved rate. The object of this change is to maintain the aggregate expected balance, but the impact will vary slightly for individual insured employers. Thus, insurance charges and premiums will be higher for some insureds and lower for others, depending on their state and hazard group assignments. For most of the insured employers electing retrospective rating, the impact on final premium from these changes will be quite small.

The improved equitability from this change will result in slightly lower average insurance charges for some states, and slightly higher for others. However, the statewide impact will be negligible. The program is designed to be revenue-neutral countrywide.

IMPLEMENTATION

Exhibit 1 displays the development of State Hazard Group Relativities. Exhibits 2 and 3 detail the changes made to the ***Retrospective Rating Plan Manual for Workers Compensation and Employers Liability Insurance.***

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EXHIBIT 1

DEVELOPMENT OF STATE HAZARD GROUP RELATIVITIES

Step 1. Individual state severities are calculated for each hazard group.

Step 2. The severities are weighted with the countrywide severities by hazard group using a credibility that varies by state. For this purpose, we regard 155,000 claims as fully credible, and use the square root rule to compute partial credibilities.

Step 3. Credibility weighted severities for each state hazard group are produced. A new countrywide average severity is calculated by taking the weighted average of the formula for state severities using claim counts as weights.

Step 4. The relativities are calculated by dividing the countrywide severity by the individual state hazard group severities.

Example: State X

Step 1	Hazard Group	State X	Countrywide
Severities	1	21,361	17,155
	2	23,085	18,894
	3	33,771	29,974
	4	45,265	43,752

Step 2		
	Claim Count	**59,672**
	Credibility =	$(59{,}672 / 155{,}000)^{0.5} = 0.62$

Step 3	Hazard Group	State X	
Cred. Wtd. Severities	1	19,763	= 0.62 x 21,361 + 0.38 x 17,155
	2	21,492	
	3	32,328	
	4	44,690	

Countrywide Overall: 23,381

Step 4	Hazard Group	State X	
Relativities	1	1.18	= 23,381 / 19,763
	2	1.09	
	3	0.72	
	4	0.52	

Note: The underlying data source for the above calculations is the Unit Statistical Plan (USP), excluding medical-only claims. The USP data for each state is adjusted accordingly, as reflected in the data underlying the Excess Loss Factor (ELF) calculation.

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ITEM R-1385—2003 UPDATE TO RETROSPECTIVE RATING PLAN PARAMETERS

EXHIBIT 2

RETROSPECTIVE RATING PLAN MANUAL
2003 EXPECTED LOSS RANGES
EFFECTIVE 12/01/03

Expected Loss Group	Range Rounded Values	Expected Loss Group	Range Rounded Values	Expected Loss Group	Range Rounded Values
95	582— 908	65	48,778— 52,682	35	608,364— 683,052
94	909— 1,345	64	52,683— 56,900	34	683,053— 766,913
93	1,346— 1,775	63	56,901— 61,455	33	766,914— 874,513
92	1,776— 2,347	62	61,456— 66,374	32	874,514— 1,005,197
91	2,348— 3,054	61	66,375— 71,687	31	1,005,198— 1,155,410
90	3,055— 3,687	60	71,688— 77,441	30	1,155,411— 1,328,073
89	3,688— 4,451	59	77,442— 83,733	29	1,328,074— 1,578,699
88	4,452— 5,167	58	83,734— 90,407	28	1,578,700— 1,887,780
87	5,168— 5,998	57	90,408— 97,408	27	1,887,781— 2,257,378
86	5,999— 6,957	56	97,409— 104,953	26	2,257,379— 2,782,879
85	6,958— 7,868	55	104,954— 113,083	25	2,782,880— 3,541,294
84	7,869— 8,894	54	113,084— 122,273	24	3,541,295— 4,506,399
83	8,895— 10,044	53	122,274— 132,246	23	4,506,400— 5,758,387
82	10,045— 11,176	52	132,247— 143,036	22	5,758,388— 7,368,401
81	11,177— 12,435	51	143,037— 154,701	21	7,368,402— 9,428,566
80	12,436— 13,833	50	154,702— 166,939	20	9,428,567— 12,064,743
79	13,834— 15,390	49	166,940— 180,115	19	12,064,744— 15,437,979
78	15,391— 16,984	48	180,116— 194,426	18	15,437,980— 21,176,377
77	16,985— 18,698	47	194,427— 211,526	17	21,176,378— 31,319,692
76	18,699— 20,587	46	211,527— 230,128	16	31,319,693— 46,321,577
75	20,588— 22,623	45	230,129— 250,366	15	46,321,578— 68,509,243
74	22,624— 24,769	44	250,367— 273,596	14	68,509,244— 101,324,625
73	24,770— 27,116	43	273,597— 299,373	13	101,324,626— 149,858,311
72	27,117— 29,690	42	299,374— 327,580	12	149,858,312— 234,585,495
71	29,691— 32,409	41	327,581— 361,116	11	234,585,496— 371,208,204
70	32,410— 35,352	40	361,117— 399,069	10	371,208,205— 587,400,049
69	35,353— 38,558	39	399,070— 441,011	9	587,400,050— & over
68	38,559— 41,807	38	441,012— 487,360		
67	41,808— 45,157	37	487,361— 541,838		
66	45,158— 48,777	36	541,839— 608,363		

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EXHIBIT 3

RETROSPECTIVE RATING PLAN MANUAL
STATE HAZARD GROUP RELATIVITIES
EFFECTIVE 12/01/03

State	Hazard Group			
	I	II	III	IV
AK	1.25	1.15	0.71	0.49
AL	1.25	1.18	0.74	0.50
AR	1.59	1.44	0.92	0.65
AZ	1.50	1.36	0.84	0.57
CO	1.24	1.11	0.70	0.47
CT	1.54	1.39	0.88	0.59
DC	1.45	1.28	0.78	0.53
FL	1.01	0.90	0.53	0.34
GA	1.20	1.10	0.70	0.48
HI	1.63	1.50	0.95	0.66
IA	1.43	1.31	0.86	0.59
ID	1.49	1.36	0.88	0.61
IL	1.36	1.27	0.89	0.62
IN	1.69	1.57	1.08	0.76
KS	1.56	1.41	0.92	0.64
KY	1.42	1.28	0.79	0.54
LA	1.31	1.23	0.76	0.52
MD	1.34	1.20	0.74	0.50
ME	1.39	1.27	0.80	0.55
MI	1.56	1.47	0.92	0.63
MO	1.42	1.29	0.87	0.59
MS	1.41	1.27	0.81	0.56
MT	1.40	1.25	0.77	0.52
NC	1.06	0.95	0.60	0.41
NE	1.32	1.18	0.75	0.51
NH	1.46	1.31	0.80	0.53
NM	1.45	1.31	0.83	0.58
NV	1.26	1.13	0.71	0.50
OK	1.69	1.53	0.98	0.68
OR	1.58	1.42	0.87	0.57
RI	1.72	1.55	0.95	0.64
SC	1.34	1.20	0.78	0.54
SD	1.47	1.33	0.84	0.58
TN	1.14	1.03	0.67	0.47
UT	1.60	1.43	0.88	0.59
VA	1.25	1.13	0.70	0.48
VT	1.37	1.25	0.79	0.55
WI	1.95	1.80	1.19	0.80