

AMENDED FILING EXPLANATION

2nd Amended Filing of the 2017 Annual Statement Explanations:

LETTER FROM NAIC



April 3, 2018

NAIC Financial Reporting & Analysis Data Validation Notification

Thomas Happensack
Safe Auto Ins Co
4 Easton Oval
Columbus, OH 43219

Re: NAIC Cocode: 25405 Group Code: 0
2017 Annual Statement filing

The second (and subsequent) pages of this notice detail discrepancies in the above filing. We request that you review each category very closely and provide the appropriate response within ten working days from receipt of this letter. Please also follow the instructions on the checklist below.

Provide the following with every response.

- Company code
- Company name
- Current contact name and phone number, if contact has changed
- Date of NAIC letter
- Name of NAIC contact on the letter
- Address every failure, unless the letter states that no correction or response is needed for a specified failure

Provide the following with Annual Statement corrections.

- Jurat Page
- Electronic partial amended Annual Statement filing via the NAIC internet filing site including all applicable PDF files
- Completed Amended Explanation Page

Provide the following with RBC corrections.

- Electronic complete amended RBC filing via the NAIC internet filing site
- Electronic Annual Statement Five-year Historical Data page
- Electronic partial amended Annual Statement filing via the NAIC internet filing site

You may receive future correspondence if additional discrepancies require your assistance. Forward all of the above to your state of domicile and to the NAIC contact below at the following address.

Calvin Ferguson
Senior Insurance Reporting Analyst
NAIC - Financial Regulatory Services
1100 Walnut Street, Suite 1500
Kansas City, MO 64106-2197
cferguson@naic.org
Phone: (816) 783-8424

cc: Financial Regulator(s) of the State of OH

ITEMS REQUIRING ACTION:

CONSISTENCY AND TEXTUAL FAILURES:

If an amendment is not provided, a valid explanation for the failure is required. Please note that a Jurat page should accompany all amendments. Although the NAIC database cannot accept a signed Jurat page, the submission of a Jurat page (signed form sent to the state of domicile) is considered an attestation that the filing has been completed in accordance with the NAIC *Annual Statement* Instructions and the AP&P manual. The explanation that your state of domicile does not require an amendment is a valid explanation. If this is the case, please provide the name and telephone number of the state contact or a copy of the documentation confirming an amendment is not required.

1. Rule Name: PZAAN000006 Description: Statement of Actuarial Opinion, Exhibit B, Disclosures, Column 3, Line 8 divided by 1000 did not equal Schedule P, Part 1, Column 23, Line 12

AMENDED FILING EXPLANATION

While the reporting entity corrected the data for the Statement of Actuarial Opinion, Exhibit B, Disclosures to match the sign in the PDF, this is now causing a crosscheck to Schedule P. Either the reporting entity is reporting the wrong sign on the PDF or the Statement of Actuarial Opinion had the wrong sign used.

Notes to Financial Statement:

Note 5 The PDF version of the Notes to Financial Statement does not match the Electronic Notes (s.txt file).

Sign in the PDF version of the Notes to Financial Statement corrected but the corrections was not made in the Electronic Notes (s.txt file). See screen clip below.

05D04A1	Aggregate amount of unrealized losses less than 12 months	-157,160
05D04A2	Aggregate amount of unrealized losses 12 months or longer	-593,648
05D04B1	Aggregate related fair value of securities with unrealized losses less than 12 months	23,702,122
05D04B2	Aggregate related fair value of securities with unrealized losses 12 months or longer	25,995,723

FHLB was added in the PDF version of the Notes to Financial Statement but the corrections was not made in the Electronic Notes (s.txt file). See screen clip below.

05L1I	FHLB capital stock	0	0	0	0	0	0	0	0	0	0.000%	0.000%
05L1J	On deposit with states	2,608,317	0	0	2,608,317	2,606,220	2,097	0	2,608,317	0.671%	0.682%	

Note 9 The PDF version of the Notes to Financial Statement does not match the Electronic Notes (s.txt file).

The PDF version of the Notes to Financial Statement corrected but the corrections was not made in the Electronic Notes (s.txt file). See screen clip below.

09A04A1	Adjusted gross DTAs amount from Note 9A1(c) (impact of tax planning strategies)	9,584,113	212,896		14,792,443	1,008,695		-5,208,330	-795,799
09A04A2	Percentage of adjusted gross DTAs by tax character attributable to the impact of tax planning strategies (impact of tax planning strategies)	10	2		25	6		-15	-4
09A04A3	Net admitted adjusted gross DTAs amount from Note 9A1(e) (impact of tax planning strategies)	9,584,113	212,896		14,792,443	1,008,695		-5,208,330	-795,799
09A04A4	Percentage of net admitted adjusted gross DTAs by tax character admitted because of the impact of tax planning strategies	27	6		62	16		-35	-10

AMENDED FILING EXPLANATIONS begin here.

1. Rule Name: PZAAN000006 Statement of Actuarial Opinion, Exhibit B, Disclosures to match the sign in the PDF and to Schedule P. – 6,687,000

Answer: This was corrected in the 1st Amended Annual Statement. Unfortunately, we included the Electronic Filing piece and missed including the Schedule P pages in the NAIC filing of the amended statement. The complete Schedule P is attached to this filing.

		2017			2016			Change		
		Ordinary	Capital	Total	Ordinary	Capital	Total	Ordinary	Capital	
9.A.4.a Memo	Original Filing	964,741	212,896	1,177,637	3,958,625	1,008,695	4,967,320	(2,993,884)	(795,799)	(3,789,683)
	Amended Filing	9,584,113	212,896	9,797,009	14,792,443	1,008,695	15,801,138	(5,208,330)	(795,799)	(6,004,129)
9.A.4.b Memo	Original Filing	5,988,862	(2,426,891)	3,561,971	9,395,277	(3,038,396)	6,356,881	(3,406,415)	611,505	(2,794,910)
	Amended Filing	9,584,113	212,896	9,797,009	14,792,443	1,008,695	15,801,138	(5,208,330)	(795,799)	(6,004,129)

Changes to Electronic Footnotes

	Original Filing	Amended Filing
5.D.4.a.1)	(157,160)	157,160
5.D.4.a.2)	(593,648)	593,648



ANNUAL STATEMENT

For the Year Ended December 31, 2017

of the Condition and Affairs of the

Safe Auto Insurance Company

NAIC Group Code..... 0, 0
(Current Period) (Prior Period)

NAIC Company Code..... 25405

Employer's ID Number..... 31-1379882

Organized under the Laws of OH

State of Domicile or Port of Entry OH

Country of Domicile US

Incorporated/Organized..... May 28, 1993

Commenced Business..... August 25, 1993

Statutory Home Office

4 Easton Oval..... Columbus OH 43219
(Street and Number) (City or Town, State, Country and Zip Code)

Main Administrative Office

4 Easton Oval..... Columbus OH
(Street and Number) (City or Town, State, Country and Zip Code)

614-231-0200

(Area Code) (Telephone Number)

Mail Address

4 Easton Oval..... Columbus OH
(Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)

Primary Location of Books and Records

4 Easton Oval..... Columbus OH
(Street and Number) (City or Town, State, Country and Zip Code)

614-231-0200

(Area Code) (Telephone Number)

Internet Web Site Address

www.safeauto.com

614-944-7680

Statutory Statement Contact

Thomas Happensack

(Area Code) (Telephone Number) (Extension)

(Name)
thomas.happensack@safeauto.com
(E-Mail Address)

614-559-5357

(Fax Number)

OFFICERS

Name	Title	Name	Title
1. Gregory A Sutton	Chief Financial Officer & Treasurer	2. Thomas J Happensack	Controller
3. Kelly A Armstrong #	Chief Legal Officer & Secretary	4. Ronald H Davies	Chief Executive Officer & President

Mark LeMaster	Claims Leader	Evan McKee	Product Leader
Partha Srinivasa	Chief Information Officer	Charles Kordes	Customer Demand & Experience Leader

OTHER

DIRECTORS OR TRUSTEES

Charles Bryan	Ryan Conlon	Ronald Davies	Ari Deshe
Elie Deshe	Jon Diamond	Gabriel Gliksberg	William Graves
Oded Gur-Arie			

State of..... Ohio
County of.... Franklin

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC *Annual Statement Instructions and Accounting Practices and Procedures* manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

(Signature)
Gregory A Sutton
1. (Printed Name)
Chief Financial Officer & Treasurer
(Title)

(Signature)
Thomas J Happensack
2. (Printed Name)
Controller
(Title)

(Signature)
Kelly A Armstrong
3. (Printed Name)
Chief Legal Officer & Secretary
(Title)

Subscribed and sworn to before me
This 5th day of April 2018

a. Is this an original filing?
b. If no 1. State the amendment number
 2. Date filed
 3. Number of pages attached

Yes [] No [X]
2
4/5/18
19