

February 13, 2018 Floyd Yager, Chair Florida Commission on Hurricane Loss Projection Methodology c/o Donna Sirmons Florida State Board of Administration 1801 Hermitage Boulevard, Suite 100 Tallahassee, Florida 32308

Re: AIR Hurricane Model for the United States Version 16.1.0 as Implemented in Touchstone Version 5.1.5

Dear Mr. Yager:

AIR has recently released an updated software platform, Touchstone Version 5.1.5, that contains the AIR Hurricane Model for the United States (the U.S. Hurricane Model) Version 16.1.0. This is an optional version of our software for clients who seek compatibility with the Windows security protocol, Transport Layer Security 1.1 (TLS 1.1).

If any of AIR's clients have adopted TLS 1.1 on their other computer assets, they will need a version of Touchstone that is compatible. According to Microsoft, the "TLS protocols are located between the application protocol layer and the TCP/IP layer, where they can secure and send application data to the transport layer." To enable Touchstone on a TLS 1.1 environment required upgrading the application's drivers to a SQL Native client driver that inherently supports TLS 1.1 protocol. This update does not result in any changes to Florida loss costs or probable maximum loss (PML) levels.

AIR would like to submit the AIR Hurricane Model for the United States Version 16.1.0 as Implemented in Touchstone Version 5.1.5 under Report of Activities, Section VI.G. as an interim software update.

In accordance with the 2017 Report of Activities, Section VI.G., we have prepared the following forms with results from the currently acceptable version, 4.1.0, and the updated version, 5.1.5, as well as a percentage change that demonstrates no change for the Commission's review:

- Form A-1 (Zero Deductible Personal Residential Loss Costs by ZIP Code)
- Form A-4 (Output Ranges)
- Form A-8 (Probable Maximum Loss for Florida)
- Form S-5 (Average Annual Zero Deductible Statewide Loss Costs Historical versus Modeled)
- Form V-2 (Hurricane Mitigation Measures and Secondary Characteristics, Range of Changes in Damage)

AIR would like to request that the same consideration be given to Touchstone 5.1.5 as has been given to other past interim software releases. We ask that the Commission confirm that the AIR Hurricane Model for the United States v16.1.0 as implemented in Touchstone 5.1.5 is considered as equivalent to the AIR Hurricane Model for the United States v16.0.0 as implemented in Touchstone 4.1.0 and accepted under the 2015 Standards.

Best regards,

Brandie Andrews, CCM

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Vice President, Regulatory and Rating Agency Client Services