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FIGURE 2.5

ADHERENCE TO BUREAU RATES - TOP 30 COMPANIES¹⁶

	Number of Top 30 Companies Writing at Bureau Rates		Percent of Market of Top 30 Companies Written at Bureau Rates	
	<u>1969</u>	<u>1976</u>	<u>1969</u>	<u>1976</u>
Auto Liability.....	24	1	62.7	3.8
Auto Physical Damage.....	21	1	53.0	1.1
Homeowners.....	24	0	75.3	0.0

In conclusion, the effects of open competition in New York can be summarized as:

- * Competitive rating did not substantially influence the price of insurance, as price remained a function of underwriting results and company operating expense.
- * Competitive rating did have a favorable impact on the population of New York's FAIR plan, and resulted in more of those risks being insured in the standard market.
- * Competitive rating allowed a greater range of rates by lessening the adherence to bureau rates of most the companies writing insurance in the state.

B. Formation of a Rural Rating Territory

Introduction

A key concept in the availability of standard fire insurance in rural Alaska is that of rating territories. Rating territories provide geographical subdivisions by which experience can be segregated, allowing for the derivation of a non-discriminatory rate. Location is often a consideration in rating overall experience for a particular line. For example, underwriting results for automobile liability coverage are often worse in the large cities than in rural areas.

The ISO has divided Alaska into two rating territories, the dividing line being the 141st meridian. Territory 01 covers Southeast Alaska and territory, 02 is the remainder of the state.¹⁷ Since most companies subscribe to ISO for fire rates, these are the only territories which exist for this particular line. For homeowners insurance, some of the companies have divided the state into different zones, however, there is no territory which has been strictly designated "rural". It is the intent of this section to suggest the formation of a rural rating territory. This would allow the development of an equitable bush rate, and avoid the problem of forming a subsidization between urban and rural Alaska.

Rating and Relativities

How is a rating territory developed and how does it work? A familiarity with rating and the use of relativities is necessary. Rating depends on an insurer's cost. The insurance premium collected is meant to cover costs the insurer expects to encounter and guarantee a reasonable profit. The insurer's cost includes two general categories. These are:

- 1) The expected loss and loss adjustment costs;
- 2) General Company expenses.

The expected loss and loss adjustment cost is also called the expected loss ratio. This is the amount an insurer can expect to pay in settling and adjusting claims and still enjoy a profit. General Company expenses are those expenses incurred in the operation of the business. A cost breakdown shows:

FIGURE 3.1¹⁸

<u>Expenses</u>	<u>Percent</u>
Company Operating Expenses	6.0
Production Cost Allowance	25.0
Taxes, Licenses & Fees	3.9
Underwriting Profit	6.0
Subtotal	<u>40.9</u>
Expected Loss and Loss Adjustment Ratio	<u>59.1</u> <u>100.0%</u>

Company operating expenses include salaries, travel, rent, insurance, etc., and amounts to 6% of the premium dollars. The production cost allowance of 25% includes agents and brokers'

commissions, and money used to generate business such as the money spent on advertising. Taxes, licenses, and fees includes premium tax and licenses required by the Insurance Department to do business in the state. The expected loss and loss adjustment ratio includes all money which can be paid to claimants (48.6%), and the 10.5% needed to adjust claims.

In general, when a company develops rates for homeowner or fire insurance, the actuary simply compares the loss ratio developed over the preceding five year period with the expected loss ratio of 59.1%. If the average loss ratio is less than 59.1%, the company will ask for a decrease. If the loss ratio is greater than 59.1%, the company will ask for an increase. The process is summarized below.

Column (1) This is the premium volume collected for each year shown. The premiums have been adjusted to reflect the current cost of insurance.

Column (2) These are the losses incurred for each year shown. The losses have been trended for inflation, and adjusted to reflect the cost of adjusting claims, and the possibility of a catastrophic loss.

FIGURE 3.2¹⁹
RATE LEVEL DETERMINATION

Accident Year Ended	(1) Earned Premiums At Present Rates	(2) Adjusted Incurred Losses	(3) Adjusted Loss Ratios (2) ÷ (3)	Weights
12/21/71	2,816,561	1,303,309	.463	.10
12/31/72	3,350,751	2,052,331	.612	.15
12/31/73	3,885,186	1,950,611	.502	.20
12/31/74	3,890,408	2,705,910	.696	.25
12/31/75	5,441,053	2,416,628	.444	.30

To arrive at the final rate level change, the loss ratios in Column (3) are weighted, so the most recent experience counts the most. The loss ratio for 1971 is weighted 10%, the loss ratio for 1972 is weighted 15%, for 1973 20%, for 1974 25%, and for 1975 30%. These are summed and then divided by the expected loss ratio of .591 to arrive at the final rate level change.

The process is summarized as:

$$\Sigma (\text{weights} \times \text{adjusted loss ratio}) = .546$$

$$(.546 \div .591) = .924$$

$$\text{Indicated Change} = -7.6\%$$

Therefore, based on the experience in Figure 3.2, the base rates for all homeowners' policies would be reduced by 7.6%, or a factor of .924.

To understand the effect of a rating territory, let us continue the explanation one step further. Assume that Territory 02 has

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To understand the effect of a rating territory, let us continue the explanation one step further. Assume that Territory 02 has

more losses than territory 01. The relative difference would then be 1.2. The base premium would then be calculated as shown.

Territory 01: Base Premium = $(1.0 \times .924) = .924$ or -7.6%

Territory 02: Base Premium = $(1.2 \times .924) = 1.108$ or +10.8%

What this shows is that Territory 01 would have a -7.6% reduction and Territory 02 would have a +10.8% increase, based on the relative difference between losses in the two territories.

It is the suggestion of the Committee that Insurance Services Office create a Territory 03 to include rural unprotected Alaska. This would allow for the development of territorial relativity based on rural experience.

One caveat to be mentioned is the suggestion that there may not be sufficient premium volume in rural Alaska to develop a statistically valid rate. The ISO has, however, developed a method to determine a credibility factor if there is not sufficient experience. Full statistical credibility is based on 40,000 house years.²⁰ That is 40,000 houses insured for one year. This means that for five years experience there would have to be a total of 8,000 policies/year. Given the same set of circumstances previously illustrated, assume there is only 20,000 house years of experience.

$$\text{Credibility Factor} = \frac{20,000^{1/2}}{40,000} = .71$$

$$\begin{aligned} \text{Territory 02: Base Premium} &= [(1.2 \times .71) + (.29 \times 1.0) \\ &\quad \times .924] = 1.055 \text{ or } +5.5\% \end{aligned}$$

What this shows is that without full statistical validity the rate increase would only be 5.5%.

In conclusion it would be up to the ISO to determine exactly what the territorial relativity would be. There are two ways this could be accomplished. First the standard companies could just start writing this business, and develop the relativity over time, or they could estimate the relativity bases on the current experience of protection class 9 & 10. As shown in the introduction, the indicated relativity for protection class 9 & 10, relative to protection class 5 was 1.348. This method would provide a far more equitable rate than the current surcharge of 175% to 300% by the surplus line companies.

C. FAIR Plans

General Description

The term FAIR plan stands for "Fair Access to Insurance Requirements." FAIR plans were created in the late sixties, intended as solutions to the availability problem of essential property insurance within the cores of major cities.²¹ Insurers were reluctant to write property insurance in these areas because of old construction, vandalism and fear of riot. To some degree these were legitimate complaints, however, in many cases the result was the denial of property insurance to clean risks by virtue of the location of their dwelling. This reluctance actually amounted to a redline, and the problem was exacerbated by the growing requirement of insurance for financing.

The problem became critical enough to finally elicit Congressional action. Congress passed the urban Property Protection and Reinsurance Act of 1968. This Act reinsured insurers against catastrophic loss caused through riot and civil disorder, but were contingent upon states adopting and insurers participating in FAIR plans.²² In the late sixties, during a time of largespread civil unrest, the riot reinsurance proved enough of an incentive that insurers actually urged the adoption of FAIR plans.²³ As the number and severity of riots

declined, and the need for the riot reinsurance became less acute, FAIR plans simply became mechanisms by which the availability of property insurance was assured to urban property owners.

FAIR plans are similar in nature to assigned risk pools for automobiles, and are a type of residual market mechanism. Companies operating within a state are required to participate in relation to the total amount of insurance which they write. There are a variety of different structures and organizations, but essentially FAIR plans are pooling arrangements which allow the insurers to spread the losses of marginal risks, or to distribute dividends if the plans operate at a profit. FAIR plans have provided insureds an optional market to the surplus line companies.

In spite of their success in providing insurance to people otherwise unable to obtain it, most FAIR plans have been unprofitable. This is basically because the plans were designed to be subsidized. Data from PIPSO, the Property Insurance Plans Services Office, shows that the total losses for all states from inception through 1976 has been \$227,808,000.²⁴ Although on a nationwide basis FAIR plans have been perennial money losers, some states have shown profits. These states are Georgia, Indiana, Louisiana, New Mexico, Puerto Rico, and the District of Columbia.²⁵ In fact, the experience of eight states

accounts for 88% of the losses.²⁶ Generally the plans with high concentrations of urban business like New York or Massachusetts suffer the greatest losses. In states like Georgia and Louisiana, losses in the FAIR plans are offset by the relatively good experience of their beach and windstorm plans.

Most FAIR plans offer fire insurance and extended coverage, and coverage for vandalism and malicious mischief. Two states, Massachusetts and Rhode Island also offer homeowner policies.²⁷ California is currently considering expanding the policy options available under their FAIR plans. Generally, coverage was limited to conform to loan requirements, although limited coverage through FAIR plans has been a major consumer complaint.

Subsidies

Most FAIR plans, since they operate at deficits, require subsidization. In some states the insurance industry has been forced into a situation where they are subsidizing insurance for substandard exposures. This represents an obvious inequity. However, had the companies not put themselves in the position where they had redlined this business, losses incurred would have been accounted for in the rating process. Most FAIR plans are subsidized by the voluntary market in the state.

There are three basic ways which the voluntary market subsidizes the voluntary or residual market. First, three states

have statutory provisions which allow the insurance industry to recoup their losses.²⁸ Second, in some states, a loading factor is applied in the rate filing for the statewide rate level determination.²⁹ Finally, the insurance industry has attempted to pad losses in FAIR plans by placing clean but perhaps marginal risks in the plan.³⁰

The three states which have recoupment provisions in the statute are Michigan, Ohio, and New Jersey. The Board of Governors of the Michigan FAIR plan estimates the deficit which they expect the plan to incur in the upcoming year. A loading factor is then applied to the rates for all homeowner and fire policies within the state. This spreads the losses among all the insureds within the state.³¹

In Ohio a rate increment was developed and was applied on April 1, 1977, and will extend to March 31, 1978. The rate increment was based on all losses of the plan from inception to present. The increments were 3% for fire and allied lines, 2% for homeowners, and 2% for commercial multi-peril. It was planned that this increment would be figured at a rate to recoup the plan's entire loss. The rate increment will be evaluated, to see if a continuation is required after March 31, 1978.³²

The New Jersey legislature has created the New Jersey Insurance Development Fund. This plan surcharges coverages for both private and commercial property. The surcharge applied is 2%.³³

Administration Organization

FAIR plans consists of a pool, a joint reinsurance association, and an industry placement facility. The pool is simply those insureds unable to purchase insurance from a standard insurer. The Joint Reinsurance Association is a group consisting of all the insurers operating within the state. The industry placement facility is the organization formed by the insurers operating within the state to handle the administrative duties of the plan.

The industry placement facility is organized and operated by the insurance industry. There are basically two types, a servicing carrier or syndicate. The servicing carrier approach is where either a single company or a group of companies handles writing policies, paying claims, and investing the capital. Under the syndicate approach, an autonomous unit is created to handle the business. The operations of the industry placement facility are overseen by a governing committee consisting primarily of members of the industry under direction of the Director of Insurance.

The Joint Reinsurance Association, as mentioned, is made up of all the insurers operating within the state. It is this organization which allows for distribution of losses or payments of dividends depending upon the financial operating results of the plan. This is a significant difference between FAIR plans and assigned risk pools. In assigned risk pools, each risk is assigned to a particular company. In the FAIR plan, all the business is pooled and the total experience is then portioned out to each company in relation to their market share. This structure allows for more equitable distribution of losses or dividends, and avoids the problem of sticking a disproportionate number of particularly bad risks with one insurer.

D. The Development of a Rural Property Insurance Pool

Introduction

The preceding discussion is background for a program to establish a rural property insurance pool. The pool is based on the concept of a FAIR plan, but with some significant changes.

These are: (1) the pool will not be associated with the Urban Property Protection and Reinsurance Act of 1968, (2) the pool will only operate in a specific geographic area, and (3) the pool will be self-rating, and will not require subsidization.

The Urban Property Protection and Reinsurance Act of 1968 is a means by which the Federal Government reinsured insurers against catastrophic loss caused through riot and civil disorder. All FAIR plans must meet specification under the act and many of the FAIR plans terminate if the Reinsurance Act is repealed. Rural Alaska was not associated with the riot and civil disorders of the late sixties, and to maintain a connection to the Reinsurance Act is unnecessary. In most cases the riot Reinsurance Act is a vestigial element of FAIR plans, and the resinsurance is no longer being purchased by insurers participating in the plans.

The second major difference is that the pool is designed to operate in a specific geographic area. Most FAIR plans were intended to operate primarily in the decaying cores of large cities. The proposed property insurance pool is designed only to operate in rural areas where it has been determined there is an availability problem in the standard market. This conforms roughly to areas designated protection class 9 or 10, but also includes a number of rural communities with limited protection. In this respect the pool is similar to some of the beach plans operating in the southern coastal states, or the brush plan in California. The urban areas of Alaska have been excluded because there is no evidence of an availability problem. This will also preclude the insurers from placing marginal risks in the plan.

Finally, the pool is designed to operate in what amounts to a separate rating territory as suggested in the second section of this report. The loss experience would be figured into the overall rate level determination and a relativity would be applied to policies issued by the pool. The relativity would be based on the loss experience from the pool. The current indicated relativity for protection class 9 is 1.195 and for protection class 10, 1.348. See "Introduction." This is based on a comparison to protection class 5 which is the base or unity premium.

Pool Operation

The pool would be administered by a Governing Committee, subject to supervision by the Director of Insurance, and operated by a manager chosen by the Committee. The Committee would consist of five insurers, one each from the following organizations:

- The American Insurance Association
- American Mutual Insurance Alliance
- National Association of Independent Insurers
- All other stock insurers
- All other non-stock insurers.

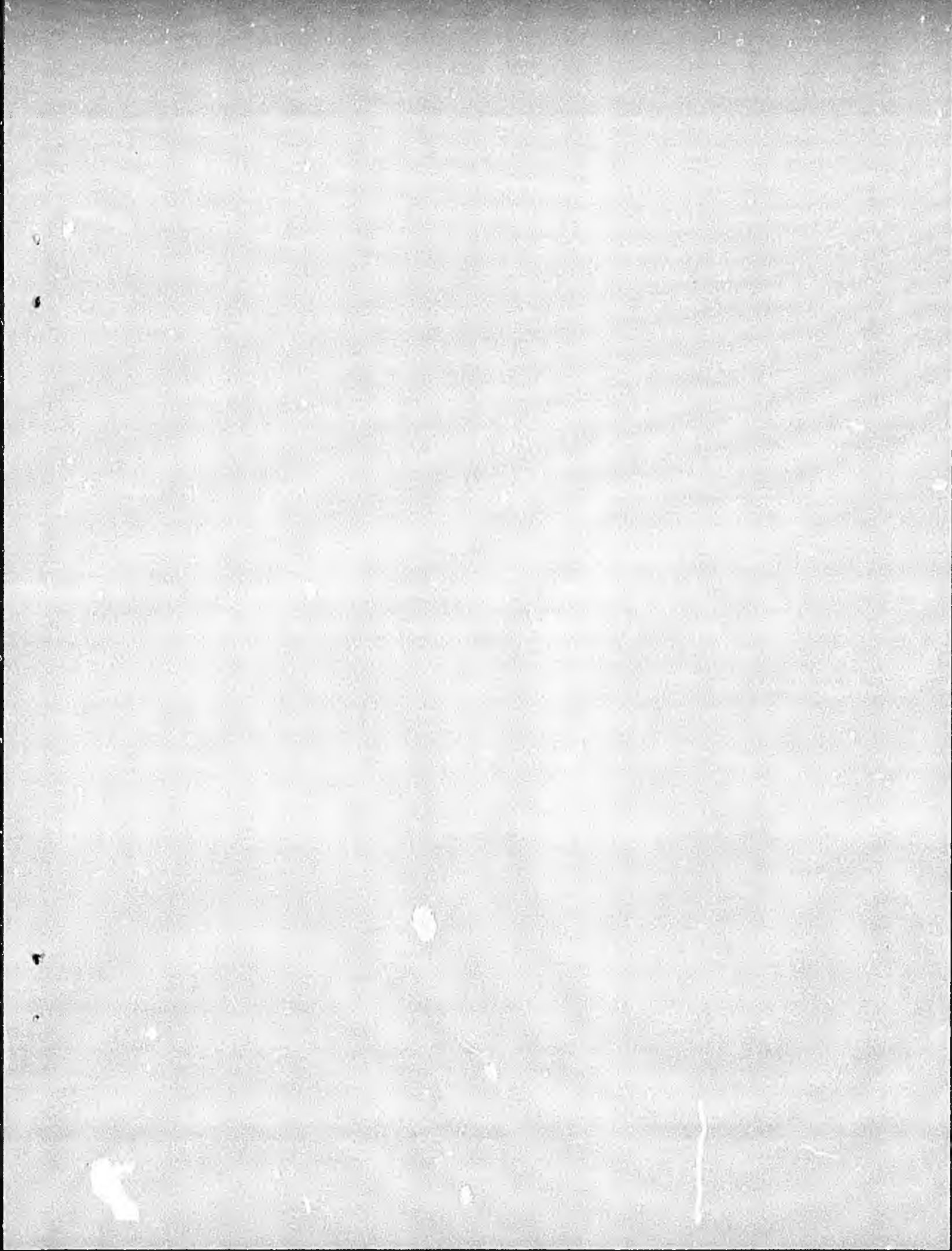
Each member would have voting power. The members from the three trade associations would be appointed by the respective member companies. The other two representatives would be elected with each insuring company's vote weighted by their respective share of the market. The governing committee would be empowered to issue operating procedures and other directives to carry out the purposes of the pool. The plan also includes provisions for the operation of a joint reinsurance association. The reinsurance association would assume reinsurance on behalf of the participating insurers, and cede reinsurance on all eligible risks. Policy limits would be set at \$1,500,000. Each insurer operating within the state is required to participate in the total writings, expenses, losses, and profits of the Association in proportion to its premiums written. If a member goes insolvent during operation of this program, the remaining members are responsible for any unpaid losses.

The pool would be required to offer a fire policy with extended coverage and coverage for vandalism and malicious mischief. This is not as complete a coverage as a homeowner policy, but it would meet the minimum requirements for bank financing. This is what is commonly referred to as essential property insurance.

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THE ALASKA EXPERIENCE

fire & homeowners
insurance

1972-1976



REPORT
ON
HOMEOWNERS AND FIRE
INSURANCE

Division of Insurance
Department of Commerce and
Economic Development
State of Alaska

January 6, 1978

Jay S. Hammond, Governor
Phillip Hubbard, Commissioner
Richard L. Block, Director

State of Alaska
Department of Commerce
& Economic Development
Division of Insurance

In January of 1977 the Division of Insurance held hearings on the subject of property insurance. These hearings were held in Anchorage, Fairbanks and Sitka and were prompted by several complaints to the division regarding the red lining of certain areas by insurance companies and by the general impression of consumer dissatisfaction. The hearings were held to determine first if there actually was a problem, and if there was a problem, of its severity, and what corrective alternatives were available.

Testimony was presented from representatives of the industry, trade associations, and a rating bureau, as well as numerous consumers. Several companies testified that their reluctance to write coverage in part of Fairbanks and outlying areas stemmed from the lack of building codes and fire protection. Consumers testified as to cancellation of present coverages and the expensive price of purchasing replacement coverage. It seemed to be the lack of standard priced insurance that was the problem, not total unavailability. In other words, the conclusion seemed to be that the problem lay not in unavailability, but in unaffordability.

Testimony also showed that consumers realizing their vulnerability in outlying areas are already establishing new volunteer fire departments and developing individual fire protection ideas.

One other step was made by concerned citizens in Fairbanks which led to the organization of the North Star Borough Inspection Council and the passage of legislation which provided for inspection of dwellings to insure proper construction and the ensuing credit allowed on insurance policies for inspected dwellings. Thus, those companies wanting the assurance of proper construction are provided with the tool of the inspection council. Credits allowed for dwellings meeting the criteria for inspection have been approved by the division and range from 5% to 10%.

Following the hearings the division began an extensive study of the property insurance market.

The study focused on the level of profitability and the rate structure of the Alaskan fire and homeowners insurance industry. Utilizing statistics already on file and data submitted by various companies upon the request of the division, the investigation was completed over the next two months, October and November.

The profitability study revealed that the fire and homeowners industry in the State is in a healthy condition. Exhibit I, Alaska Fire Insurance Experience 1972-76, shows that that line has had fine five year level of profitability, with the exception of a disastrous 1976 which was the result of the experience of some four or five companies. Despite this, the five year loss ratio was 45.9%. Exhibit II, the combined experience and expense exhibit, which has become an important tool in the division's market surveillance efforts, demonstrates the approximate permissible loss ratio's for companies in Alaska. The 1975 data requires some explanation. The expense figures submitted by the Reserve Insurance Company are not regarded as credible. A quick comparison with the statistics supplied by the other companies is graphic explanation. The second set of totals (noted "See Reserve") represent the average expenses, discounting Reserve's figures. The resultant permissible loss ratio is 62.4%. For 1976 it is 62.7%, with a two year average 62.6% permissible loss ratio, the 45.9% actual loss ratio for 1972-76 leaves a margin of some 16.7% for profit. Provision for bulk reserves would have to be made from this margin, but there is still an excellent return.

Exhibits III and IV are identical studies in the homeowners insurance line. The Experience Tables indicate that homeowners companies in Alaska have enjoyed a fairly consistent five year loss picture. The overall ratio is 48.0%. The Expense charts show a permissible loss ratio of 58.7% in 1975 and 60.1% in 1976, a 59.5% average. A margin of some 11.5%, discounting bulk reserves. Again, a good return for the industry.

The high level of profit for the two lines is further supported by the next two exhibits. While neither of these exhibits contains a large enough percentage of the total market to be regarded concrete trends, they are valuable indicators nonetheless. In any event, the companies included in Exhibits V and VI were the only ones who were able to respond to our requests for the information therein. Exhibit V suggests that the prosperity of the fire insurance business was felt by both the dwelling and commercial lines which had respective five year loss ratios of 32.8% and 41.8%. Exhibit VI details the zone experience of four homeowners companies, including the top three. The result is that both zones are shown to render a profit, despite inflation of the loss figures by State Farm's inclusion of loss adjustment expenses with losses.

It has been established that fire and homeowners insurance are moneymaking endeavors in Alaska. Whether or not the rates which produce such profits are excessive is the natural question. The factors involved in such a question include rate levels and distribution, availability of insurance and competition for the market. An examination of these elements follows.

Exhibit VII, lists the rates for fire insurance charged by companies subscribing to the Insurance Services Office rating plan. These companies accounted for 91.2% of the earned premium volume in Alaska in 1975 and 1976 and include the top sixteen companies each year. Exhibit VIII, displays the rates for the top ten Alaskan homeowners companies in 1976. These companies totaled 87.7% of the earned premium volume for that year. In both cases the rates rise as the protection class designation rises. Exhibit IX lists ISO fire premium relativities, both those currently in use and those indicated by actual loss experience. The current relativities, using class 5 premiums as the base, show that the premium load is borne heavily by protection classes seven through ten, particularly classes nine and ten, the unprotected areas. The indicated relativities demonstrate that the premium load is not equitably distributed. The lower protection classes pay less than experience indicates they should and the upper classes (seven through ten) pay on the average about twice what the experience would seem to indicate they should pay. The inequitable distribution of premium weight is further supported by Exhibit X. For the years 1971-75 the unprotected classes have a consistently lower loss experience for the ISO dwelling comprehensive (standard) fire policy than do the protected classes. The five year loss ratio for protected areas is 40.4% and for unprotected it is 25.5%. What data is available on homeowners insurance seems to suggest that the premium distribution there is more closely aligned to loss experience.

The matter of competition for the consumer's premium dollar is addressed by Exhibits XI and XII. The market concentration share charts are extremely interesting. They indicate that the Alaskan markets for both homeowners and fire insurance are dominated by a few companies. The homeowners line has five companies accounting for 64.5% to 73.4% of business from 1972-76, while nationwide, in 1976, twenty-six groups, each comprised of a varying number of companies (figures were not available for individual companies) totaled 64.8% of the market. Fire insurance shows 10 companies holding 57.1% to 69.1% of the market for the period, while nationwide the top twenty-six groups in 1976 had a 59.0% market share.

It is obvious that competition in Alaska is not nearly of the level that it is nationally. The percentage of the Alaskan fire premium written by surplus lines companies (Exhibit XII) is further evidence that statewide competition for the insurance dollar may not be what it could. With portions like 26.9% and 32.8% of the written premiums for fire insurance being supplied by surplus (non-admitted) companies it is apparent that, for one reason or another, including proper underwriting restrictions; many Alaskans find it necessary to turn to highly priced markets in order to insure their property. Surplus lines companies do not submit separate figures for homeowners insurance.

To properly investigate the question of availability, the existence of a hidden component must be recognized. This factor is, is what is available, affordable? To determine the availability of fire and homeowners insurance, the division conducted a telephone poll of agents across the state. Agencies in Anchorage, Kenai, Palmer, Juneau, and Fairbanks were contacted. The general consensus, excepting Fairbanks, was that insurance was available for everyone who had insurable property. Most unprotected property could be placed in the standard market, depending on condition and location of the property, and surplus lines would write the remainder, in almost all cases. Fairbanks was a different story. One agent stated that all his business, even in Protection class four areas, was through non-admitted markets. Another said that most risks within 10 miles of the city limits could be placed in the standard market, although his agency was selective about whom they did insure, in order not to jeopardize the market. Still another agency replied that nothing outside of the North Star Borough could be written in the standard market. They also said log homes were not insured unless "significant amounts of other construction classes" were involved. All said that property whose condition or location precluded standard coverage usually could be written by surplus companies. These statements agreed in general tenor with what had come out of the hearings in January. The complaint then seemed to be more one of price rather than availability, that the admitted carriers were not making reasonably priced insurance available to all those who desired it.

Insurance for property owners unable to obtain coverage in the standard market is available from two sources. One admitted company has filed a fire program to insure sub-standard dwellings at 175% of ISO fire rates. This company currently writes only a very small percentage of the market in Alaska. Most consumers find they have to resort to the surplus companies. A telephone interview of five surplus lines brokers who specialize in homeowners and fire insurance was made by the division. The resultant picture of the

surplus fire rates was that they ranged from 150% to 300% of the ISO dwelling fire rates, with the majority at the top end of the spectrum. Examination of 59 homeowners policy affidavits filed by one surplus lines broker confirmed this, eight being 225% of ISO rates and 51 being 300%. Fifty fire policy affidavits filed by the same broker showed 5 at 200% of ISO fire rates, one at 225% and 44 at 300%. A perusal of Exhibit VII demonstrates that 300% of ISO fire rates for unprotected dwellings is getting into a lot of money. For purposes of comparison, please note that Fireman's Fund and Pacific Insurance Companies utilize the standard ISO homeowners rates (Exhibit VIII). Again, the cost is steep at 300% of ISO

The five year financial history of the personal lines of property insurance has been one that has reflected solid earnings to the industry. The rate structure and level of competition, for whatever reason, do not serve the consumer as well as they should. In view of the high level of profitability for the state as a whole, the industry should be considering lower rates and expanded markets. The Division of Insurance has been encouraging this approach as a voluntary solution by the companies. On the other hand, a number of plans to assure the availability of reasonably priced insurance, such as a Joint Underwriting Association or a Market Availability Program, have been suggested.

The division also has begun to assume the responsibility of better informing (via this report) the consumers of alternatives available to them. The wise consumer will help himself, by shopping thoroughly for insurance and making certain the dwelling he builds or buys is constructed to meet all applicable safety codes. If the consumer takes positive aggressive action, the industry will find it in their own best interests to respond in kind. The data contained in this report indicates that the situation is ripe for change. Concerted effort by industry, government and consumer will effect that change.

Richard L. Rainery
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Marilyn L. Van Vleet
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Division of Insurance
January 6, 1978

Exhibit I

Alaska Fire Insurance Experience - 1972

Company	Earned Premium	Incurred Losses	Loss Ratio
New Hampshire Insurance Co.	\$ 986,869	\$ 387,489	39.3
U.S. Fire Insurance Co.	895,095	472,374	52.3
Pacific Insurance Co.	519,108	63,568	12.3
Highland Insurance Co.	486,640	502,734	103.3
Fireman's Fund Insurance Co.	439,520	205,472	46.7
Insurance Co. of N. America	423,937	248,195	58.5
Great American Insurance Co.	341,585	230,795	67.6
Hartford Fire Insurance Co.	334,151	132,259	39.8
Employers Commercial Union Insurance	330,012	227,886	69.1
U.S. Fidelity & Guaranty Co.	309,553	125,208	41.9
Eagle Star Insurance Co.	309,189	129,680	41.9
Harbor Insurance Co.	289,950	11,400	3.9
Home Insurance Co.	171,435	139,623	80.7
North River Insurance Co. (N.J.)	166,561	76,144	45.7
State Farm Fire & Casualty Co.	159,971	55,349	34.6
Allstate Insurance Co.	146,723	26,538	18.1
Jefferson Insurance Co. of N.Y.	89,004	28,619	32.3
Westchester Fire Insurance Co.	78,186	80,232	102.6
Aetna Casualty & Surety Co.	73,286	1,967	2.7
Continental Insurance Co.	72,558	58,496	80.6
St. Paul Fire & Marine Insurance Co.	66,863	21,933	32.8
Hillmark Insurance Co.	64,203	3,926	6.1
Central Mutual Insurance Co.	62,610	15,139	24.2
State Farm General Insurance Co.	55,583	3,866	6.9
North East Insurance Co.	55,330	41,264	74.6
Mission Insurance Co.	55,222	4,068	7.4
Total (95.25 of all business)	\$6,981,225	\$3,293,674	47.2
Total All Cos.	\$7,329,794	\$3,480,847	47.5

Alaska Fire Insurance Experience - 1973

Company	Earned Premium	Incurred Losses	Loss Ratio
New Hampshire Insurance Co.	\$ 872,330	\$ 343,665	39.4
U.S. Fire Insurance Co.	683,105	30,787	4.5
Insurance Co. of N. America	568,404	99,677	17.5
Pacific Insurance Co.	560,230	136,299	24.3
Highlands Insurance Co.	555,453	32,954	5.9
Fireman's Fund Insurance Co.	394,571	61,937	15.7
Great American Insurance Co.	272,750	100,075	36.7
Mission Insurance Co.	263,166	1,231,806	468.1
Harbor Insurance Co.	238,252	2,336	1.0
American Home Assurance Co.	221,446	0	0.0
Home Insurance Co.	219,021	45,346	20.7
Commercial Union Insurance Co.	215,707	27,820	12.9
Hartford Fire Insurance Co.	204,542	82,978	40.6
U.S. Fidelity & Guaranty Co.	186,630	93,659	50.2
Allstate Insurance Co.	175,471	56,556	32.2
State Farm Fire & Casualty Co.	171,366	34,937	20.4
Eagle Star Insurance Co.	171,309	(1,745)	(1.0)
Industrial Indemnity Co. of Alaska	145,760	85,871	58.9
North River Insurance Co. (N.J.)	113,778	49,458	43.5
Lumberman's Underwriters Alliance	93,955	0	0.0
Yosemite Insurance Co.	91,163	0	0.0
Reserve Insurance Co.	88,739	0	0.0
St. Paul Fire & Marine Insurance Co.	81,786	52	0.1
Providence Washington Insurance Co. of Alaska	78,520	10,854	13.8
Central National Insurance Co. of Omaha	77,585	0	0.0
Atlas Assurance Co., Ltd.	75,009	0	0.0
Hillmark Insurance Co.	69,685	65,913	94.6
State Farm General Insurance Co.	64,298	27,295	42.5
Arkwright-Boston Manufacturers Mutual Insurance Co.	62,860	(1,045)	(2.9)
Alaska Insurance Co.	62,460	0	0.0
Unigard Mutual Insurance Co.	62,033	0	0.0
Peninsular Fire Insurance Co.	59,007	2,741	4.6
Jefferson Insurance Co. of N.Y.	58,951	42,335	71.8
Westchester Fire Insurance	55,595	40,428	72.7
Allendale Mutual Insurance Co.	51,460	0	0.0
Providence Washington Insurance Co.	38,153	0	0.0
Central Mutual Insurance Co.	33,230	1,442	4.3
Protection Mutual Insurance Co.	29,615	(88,862)	(300.1)
American Manufacturing Insurance Co.	29,508	12,685	43.
Total (95% of all business)	\$7,500,149	\$2,627,454	35.0
Total All Cos.	\$7,893,310	\$2,721,742	34.5

Alaska Fire Insurance Experience - 1974

Company	Earned Premium	Incurred Losses	Loss Ratio
Mission Insurance Co.	\$ 869,865	\$ 19,193	2.2
Pacific Insurance Co.	547,449	170,145	31.1
Alaska Insurance Co.	531,924	61,533	11.6
Industrial Indemnity Co. of Alaska	516,571	121,971	23.6
New Hampshire Insurance Co.	514,486	172,422	33.5
Highlands Insurance Co.	511,787	150,935	37.3
Stuyvesant Insurance Co.	356,737	12,215	3.4
Unigard Mutual Insurance Co.	355,356	0	0.0
U.S. Fire Insurance Co.	317,087	131,890	41.6
Fireman's Fund Insurance Co.	314,770	35,121	11.2
Providence Washington Insurance Co. of Alaska	280,732	17,069	6.1
Insurance Co. of N. America	272,295	12,753	4.7
Commercial Standard Insurance Co.	242,411	0	0.0
Reserve Insurance Co.	218,923	7,184	3.3
State Farm Fire & Casualty Co.	193,951	32,575	16.4
Allstate Insurance Co.	190,67	73,275	38.5
Great American Insurance Co.	171,133	70,124	37.1
Harbor Insurance Co.	162,825	60	0.0
U.S. Fidelity & Guaranty Co.	155,863	874	0.6
Hartford Fire Insurance Co.	134,635	6,125	4.5
St. Paul Fire & Marine Insurance Co.	114,580	7,325	6.4
Yosemite Insurance Co.	107,773	3,112	2.9
Central National Insurance Co. of Omaha	97,942	0	0.0
Atlas Assurance Co., Ltd.	95,073	114,195	120.1
Peninsular Fire Insurance Co.	92,416	2,800	3.1
Commercial Union Insurance Co.	84,036	31,309	37.2
American Home Assurance Co.	71,693	85,000	118.6
Arkwright-Boston Manufacturers Mutual Insurance Co.	68,511	3,747	5.5
State Farm General Insurance Co.	62,938	19,795	31.4
Hillmark Insurance Co.	61,929	6,011	9.7
Allendale Mutual Insurance Co.	57,320	0	0.0
Home Insurance Co.	55,038	59,031	107.3
Lumberman's Underwriting Alliance	49,310	0	0.0
Providence Washington Insurance Co.	35,246	0	0.0
North River Insurance Co. (N.J.)	38,076	59,678	156.7
Jefferson Insurance Co. of N.Y.	32,622	11,498	35.2
Federal Insurance Co.	31,508	2,000	6.3
Allied Insurance Co.	30,641	1,615	5.3
Total (95.12 of all business)	\$8,050,779	\$1,544,666	19.2
Total All Cos.	\$8,467,152	\$1,786,314	21.0

Alaska Fire Insurance Experience - 1975

Company	Earned Premium	Incurred Losses	Loss Ratio
Alaska Insurance Co.	\$ 998,163	\$ 299,098	29.1
Pacific Insurance Co.	679,031	987,734	144.7
Industrial Indemnity Co. of Alaska	645,176	235,288	36.5
Unigard Mutual Insurance Co.	613,632	760,200	123.9
American Home Assurance Co.	493,162	363,121	73.2
Providence Washington Insurance Co. of Alaska	406,177	101,782	25.1
Highlands Insurance Co.	387,345	78,374	20.2
Fireman's Fund Insurance Co.	373,781	71,034	6.5
Great American Insurance Co.	284,233	102,730	36.1
Insurance Co. of N. America	278,895	68,141	24.6
Reserve Insurance Co.	257,175	37,320	14.7
New Hampshire Insurance Co.	235,724	14,858	6.3
State Farm Fire & Casualty Co.	221,484	54,923	24.8
Mission Insurance Co.	166,305	30,078	18.1
Harbor Insurance Co.	165,824	457,198	275.7
Allstate Insurance Co.	161,891	28,723	17.7
Aetna Insurance Co.	154,409	11,091	7.2
Yosemite Insurance Co.	149,239	70,254	47.3
Stuyvesant Insurance Co.	14,997	0	0.0
St. Paul Fire & Marine Insurance Co.	130,627	51,636	39.5
U.S. Fidelity & Guaranty Co.	113,122	35,003	30.9
Peninsular Fire Insurance Co.	109,273	32,019	29.1
Home Insurance Co.	107,260	163,556	152.5
Commercial Union Insurance Co.	96,034	56,289	58.6
U.S. Fire Insurance Co.	90,220	28,420	31.5
Central National Insurance Co. of Omaha	88,513	0	0.0
Arkwright-Boston Manufacturers Mutual Insurance Co.	86,414	1,000	1.2
Hillmark Insurance Co.	85,256	13,517	15.7
National Union Fire Insurance Co.	84,479	50,000	59.2
State Farm General Insurance Co.	65,225	8,516	13.1
Allendale Mutual Insurance Co.	63,161	1,000	1.6
Hartford Fire Insurance Co.	61,017	100,215	164.2
Atlas Assurance Co., Ltd.	49,183	28,611	58.2
Providence Washington Insurance Co.	7,574	2,939	6.2
Protection Mutual Insurance Co.	40,000	(46,000)	(113.7)
Allied Insurance Co.	39,234	4,373	11.4
Travelers Indemnity Co.	28,583	1,903	6.6
Total (95% of all business)	\$8,129,851	\$4,243,027	52.2
Total All Cos.	\$3,553,593	\$4,360,149	51.0

Alaska Fire Insurance Experience - 1976

Company	Earned Premium	Incurred Losses	Loss Ratio
Alaska Insurance Co.	\$1,484,200	\$ 226,176	15.2
Industrial Indemnity Co. of Alaska	870,433	340,523	39.1
Pacific Insurance Co.	611,150	482,158	78.9
National Union Fire Insurance Co.	563,269	1,030	0.2
Great American Insurance Co.	420,181	210,730	50.2
Providence Washington Insurance Co. of Alaska	402,388	31,272	8.3
Fireman's Fund Insurance Co.	387,998	122,764	31.6
Aetna Insurance Co.	350,709	2,051,139	584.9
American Home Assurance Co.	341,613	795,922	233.0
Mission Insurance Co.	292,384	449	0.2
Atlas Assurance Co., Ltd.	290,360	41,136	14.2
Insurance Co. of N. America	259,023	54,721	21.1
Highlands Insurance Co.	235,371	25,063	10.6
State Farm Fire & Casualty Co.	234,964	122,337	52.1
Allstate Insurance Co.	209,719	264	0.1
St. Paul Fire & Marine Insurance Co.	202,109	28,840	14.3
Affiliated FM Insurance Co.	135,053	0	0.0
Puritan Insurance Co.	130,457	0	0.0
Arkwright-Boston Manufacturers Mutual Insurance Co.	120,394	25,562	21.2
Reserve Insurance Co.	113,917	483,074	424.1
U.S. Fidelity & Guaranty Co.	100,215	10,994	10.9
Peninsular Fire Insurance Co.	94,230	1,139	1.2
Allied Insurance Co.	79,674	0	0.0
Central National Insurance Co. of Omaha	76,106	1,743	2.3
Harbor Insurance Co.	75,493	238,268	315.6
Allendale Mutual Insurance Co.	73,713	22,792	30.9
Protection Mutual Insurance Co.	60,652	100,000	164.9
State Farm General Insurance Co.	60,129	34,226	56.9
Commercial Union Insurance Co.	54,545	16,314	29.9
Hallmark Insurance Co.	52,569	30,314	57.7
Hartford Fire Insurance Co.	50,115	5,272	10.5
Employers Mutual Liability Insurance Co.	47,268	0	0.0
Hone Insurance Co.	46,653	4,839	10.4
Unigard Mutual Insurance Co.	36,127	790,619	2,189.4
New Hampshire Insurance Co.	32,172	168,939	525.1
Horace Mann Insurance Co.	28,193	494	1.8
U.S.A.A.	27,927	0	0.0
Lumberman's Underwriting Alliance	26,019	0	0.0
Aetna Casualty & Surety Co.	25,514	177	0.7
American Motorists Insurance Co.	24,670	44,000	178.4
Total (95.4% of all business)	\$9,726,601	\$6,515,280	74.6
Total All Cos.	\$9,147,766	\$6,653,254	72.7

Alaska Fire Insurance Experience - 1972-76

Company	Earned Premium	Incurred Losses	Loss Ratio
Alaska Insurance Co.	\$ 3,048,807	\$ 579,801	18.8
Pacific Insurance Co.	2,916,968	1,835,294	62.9
New Hampshire Insurance Co.	2,641,581	1,087,371	41.2
Industrial Indemnity Co. of Alaska	2,177,940	783,673	36.0
Highlands Insurance Co.	2,176,536	830,160	38.1
United States Fire Insurance Co.	2,000,365	664,826	33.2
Fireman's Fund Insurance Co.	1,860,640	446,328	24.0
Insurance Co. of N. America	1,800,614	483,487	26.9
Mission Insurance Co.	1,647,122	1,286,344	78.1
Great American Insurance Co.	1,507,932	714,454	47.4
Providence Washington Insurance Co. of Alaska	1,167,817	162,977	14.0
American Home Assurance Co.	1,158,926	1,273,910	109.9
Unigard Mutual Insurance Co.	1,067,148	1,550,019	145.3
State Farm Fire & Casualty Co.	956,036	300,121	30.4
Harbor Insurance Co.	938,344	709,262	75.6
Allstate Insurance Co.	882,571	105,356	12.0
U.S. Fidelity & Guaranty Co.	846,043	265,688	31.4
Hartford Fire Insurance Co.	781,380	326,049	41.6
Commercial Union Insurance Co.	780,384	359,618	46.1
Reserve Insurance Co.	703,612	528,198	75.1
National Union Fire Insurance Co.	678,144	51,150	7.5
Hone Insurance Co.	599,407	471,375	68.6
St. Paul Fire & Marine Insurance Co.	595,965	109,786	18.4
Aetna Insurance Co.	562,703	2,060,276	366.5
Stuyvesant Insurance Co.	551,400	12,217	2.2
Atlas Assurance Co., Ltd.	525,679	183,942	35.0
Eagle Star Insurance Co., Ltd.	480,031	178,041	26.7
Arkwright-Boston Manufacturers Mutual Insurance Co.	391,949	30,714	7.8
Central National Insurance Co. of Omaha	385,923	2,258	0.6
Peninsular Fire Insurance Co.	377,808	37,413	10.4
Yosemite Insurance Co.	375,081	111,190	30.2
North River Insurance Co. (N.J.)	339,374	185,322	54.6
Hallmark Insurance Co.	333,642	119,681	35.7
State Farm General Insurance Co.	308,331	93,729	30.4
Commercial Standard Insurance Co.	291,775	0	0.0
Allendale Mutual Insurance Co.	284,094	23,792	8.4
Lumberman's Underwriting Alliance	214,507	0	0.0
Jefferson Insurance Co. of N.Y.	203,335	80,074	39.3
Protection Mutual Insurance Co.	201,181	11,135	5.5
Affiliated FM Insurance Co.	166,060	0	0.0
Allied Insurance Co.	163,335	(2,748)	(1.7)
Westchester Fire Insurance Co.	154,732	135,244	87.4
Aetna Casualty & Surety Co.	151,164	2,135	1.4
Total (95.3% of all business)	\$39,464,912	\$18,167,232	46.0
Total All Cos.	\$41,391,653	\$19,002,306	45.9

Exhibit II

1975 - ALASKA FIRE INSURANCE EXPERIENCE AND EXPENSES

(S) Company	Earned Premium	Inurred Losses	Loss Ratio	Loss Adjust. Expenses	Commission Brokerage	Other Acq. Field Super. Collection	General Expenses	Taxes Licenses Fees	Total Expenses Incurred	Resultant: Permissible Loss Ratio
*Alaska Insurance Co.	\$ 978,163	\$290,098	29.15	5.1	21.2	4.0	3.4	3.5	37.2	62.8
*Pacific Insurance Co.	679,031	982,734	144.7	2.5	23.9	2.3	7.6	2.7	39.0	61.0
*Industrial Indemnity Company of Alaska	645,176	235,288	36.5	5.5	19.3	3.0	10.6	2.5	40.9	59.1
*Unigard Mutual Insurance Co.	613,632	760,200	123.9	2.8	19.4	5.6	8.2	2.3	38.3	61.7
*American Home Assurance Co.	483,162	363,121	75.2	3.7	21.9	2.9	3.0	4.0	32.1	67.9
*Provident Washington Insurance Co. of Alaska	406,177	101,782	25.1	4.9	18.3	4.2	12.3	2.7	42.4	57.6
*Highlands Insurance Co.	387,345	78,374	20.2	2.4	26.4	2.1	2.0	2.0	31.9	68.1
*Fireman's Fund Insurance Co.	323,781	21,034	6.5	5.3	12.9	3.5	11.1	1.9	34.7	65.3
*Great American Insurance Co.	284,283	102,730	36.1	4.4	20.3	3.0	12.8	2.6	43.1	56.9
*Insurance Co. of North America	276,895	68,141	24.6	3.9	13.1	4.7	9.8	3.8	35.3	64.7
*Reserve Insurance Co.	257,175	37,980	14.7	106.2	40.0	178.5	117.5	83.3	472.9	(372.9)
*New Hampshire Insurance Co.	235,724	14,858	6.3	5.1	21.2	4.0	3.4	3.5	37.2	62.8
*State Farm Fire & Casualty Co.	221,484	54,923	24.8	3.5	27.3	4.1	4.6	1.1	40.8	59.2
*Mission Insurance Co.	166,385	30,828	18.5	1.3	11.9	2.5	0.6	2.1	18.4	81.6
*Harbor Insurance Co.	165,824	457,198	275.7	1.2	18.6	0.9	2.4	4.2	27.2	72.8
*Allstate Insurance Co.	161,891	28,723	17.7	3.0	18.7	4.2	4.2	2.6	32.7	67.3
*Aetna Insurance Co.	154,409	11,091	7.2	5.2	20.2	3.5	8.3	3.6	40.8	59.2
*Yosemite Insurance Co.	149,239	70,254	47.3	4.9	25.9	5.9	3.6	3.1	43.4	56.6
*Stuyvesant Insurance Co.	134,997	0	0.0	2.1	19.8	1.2	5.4	1.4	29.8	70.2
*St. Paul Fire & Marine Insurance Co.	130,627	51,616	39.5	2.6	19.6	2.4	10.3	3.4	38.3	61.7
*U.S. Fidelity & Guaranty Co.	113,122	35,003	30.9	3.2	16.6	7.4	8.4	2.3	32.9	67.1
*Peninsular Fire Insurance Co.	109,273	32,019	29.3	7.1	12.3	5.4	5.7	4.9	35.5	64.5
*Home Insurance Co.	107,260	163,556	152.5	4.7	14.5	2.2	9.8	2.9	34.1	65.9
*Commercial Union Insurance Co.	96,084	56,289	58.6	2.5	16.6	1.9	10.4	3.2	34.6	65.4
*U.S. Fire Insurance Co.	90,370	28,420	31.5	5.5	19.3	3.0	10.6	2.5	40.9	59.1
*Central National Insurance Co. of Omaha	88,513	0	0.0	3.7	5.3	12.2	8.6	17.6	47.4	52.6
Arthurright-Boston Manufacturers Mutual Insurance Co.	86,414	1,000	1.2	3.2	2.3	9.7	15.1	5.0	35.3	64.7
*Hallmark Insurance Co.	85,256	13,517	15.9	18.8	(71.4)	92.5	17.3	17.7	72.7	27.3
*National Union Fire Insurance Co.	84,879	50,000	59.2	3.7	21.9	2.8	3.0	3.7	35.1	64.9
*State Farm General Insurance Co.	65,225	8,546	13.1	3.7	22.2	6.4	6.7	1.8	40.8	59.2
Allendale Mutual Insurance Co.	63,161	1,000	1.6	1.9	6.3	10.9	6	2.5	32.2	67.8
*Hartford Fire Insurance Co.	61,037	100,215	164.2	4.4	20.9	2.2	8	3.1	42.4	57.6
*Atlas Assurance Co., Ltd.	49,183	28,611	58.2	4.9	31.7	0.0	1	9.5	52.2	47.8
*Provident Washington Ins. Co.	47,574	2,919	6.2	4.9	18.3	4.2	3	2.7	42.4	57.6
*Protection Mutual Insurance Co.	40,463	(46,000)	(113.7)	2.6	1.4	11.6	9.5	2.9	28.0	72.0
*Allied Insurance Co.	38,234	4,373	11.4	3.9	13.1	4.7	9.8	3.8	42.6	57.4
Travelers Indemnity Co.	28,853	1,903	6.6	4.0	14.2	5.8	15.3	3.3	42.6	57.4
Total (95% of all business) - Average	\$8,179,851	\$4,243,027	52.2	7.3	19.2	8.6	10.8	5.7	51.5	48.5
Total All Companies	\$8,553,533	\$4,360,149	51.0	4.1	18.3	4.6	7.4	3.2	See Reserve 37.6	62.4
*ISO Total (93% of all business) - Average	\$7,951,423	\$4,331,124	54.5	7.4	19.4	8.5	10.8	5.7	51.8	48.2
									37.7	62.3

1976 - ALASKA FIRE INSURANCE EXPERIENCE AND EXPENSES

Company	Earned Premium	Inurred Losses	Loss Ratio	Loss Adjust. Expenses	Commission Brokerage	Other Acq. Field Super. Collection	General Expenses	Taxes Licenses Fees	Total Expenses Incurred	Resultant: Permissible Loss Ratio
Alaska Insurance Co.	\$ 1,484,200	\$ 226,176	15.25	4.8	20.2	4.5	2.9	3.6	36.0	64.0
Industrial Indemnity Company of Alaska	870,433	340,523	39.1	10.4	17.6	2.4	7.3	2.9	40.6	59.4
Pacific Insurance Co.	611,150	482,148	78.9	2.4	22.9	1.9	5.9	1.8	33.9	66.1
National Union Fire Insurance Co.	563,269	1,030	0.2	4.5	24.9	4.0	4.1	3.9	41.4	58.6
Great American Insurance Co.	470,181	210,730	50.7	4.4	19.1	3.8	14.3	2.4	44.0	56.0
Provident Washington Insurance Co. of Alaska	402,308	33,272	8.3	3.7	19.5	1.8	8.6	2.4	36.0	64.0
Fireman's Fund Insurance Co.	387,978	122,784	31.6	5.5	15.5	3.5	10.3	2.6	37.4	62.6
Aetna Insurance Co.	350,700	2,051,139	584.9	3.5	20.3	3.2	8.2	3.2	38.4	61.6
American Home Assurance Co.	341,613	795,922	231.0	4.5	24.9	4.0	4.1	3.9	41.4	58.6
Mission Insurance Co.	293,360	449	0.2	1.7	(28.6)	4.1	1.1	3.0	(10.6)	118.6
Atlas Assurance Co. of London Ltd.	293,043	41,136	14.2	2.9	32.9	0.0	3.2	8.2	47.2	52.8
Insurance Co. of North America	239,073	54,721	23.1	2.8	13.5	4.4	9.8	4.0	34.5	65.5
Highlands Insurance Co.	235,371	25,063	10.6	2.9	27.3	1.4	2.1	2.0	36.4	63.6
State Farm Fire & Casualty Co.	234,964	122,337	52.1	3.2	24.4	0.1	5.9	3.0	43.6	56.4
Allstate Insurance Co.	208,119	764	0.1	4.0	18.5	4.6	2.1	2.5	32.5	67.5
St. Paul Fire & Marine Insurance Co.	202,109	28,840	14.3	1.9	18.9	2.3	9.8	3.3	36.2	63.8
Affiliated FM Insurance Co.	135,058	0	0.0	8.4	33.5	2.8	0	21.5	66.7	33.0
Puritan Insurance Co.	130,457	0	0.0	10.5	9.2	6.1	33.6	21.2	88.6	11.4
Arthurright-Boston Manufacturers Mutual Insurance Co.	120,394	25,562	21.2	2.2	1.1	7.7	15.7	4.4	31.1	69.9
Reserve Insurance Co.	113,917	483,074	424.1	4.1	19.2	1.6	11.8	2.7	32.4	60.6
U.S. Fidelity & Guaranty Co.	100,115	10,994	10.9	3.7	17.4	2.7	8.0	3.2	35.0	65.0
Peninsular Fire Insurance Co.	94,090	1,139	1.2	8.9	14.8	15.2	6.7	8.7	54.2	45.0
Allied Insurance Co.	79,674	0	0.0	2.9	13.8	4.3	9.5	4.0	34.5	65.5
Central National Insurance Co. of Omaha	76,106	1,743	2.3	3.3	(53.2)	12.6	16.6	33.1	12.4	87.6
Harbor Insurance Co.	75,493	230,260	315.6	3.9	(17.5)	7.7	2.2	10.8	2.1	97.9
Allendale Mutual Insurance Co.	73,214	22,792	30.9	2.9	8.4	11.3	15.7	2.8	41.1	58.9
Protection Mutual Insurance Co.	60,652	100,001	163.9	2.6	7	14.2	1.9	4.5	23.4	76.6
State Farm General Insurance	60,129	34,276	56.9	3.2	24.4	8.1	5.9	3.0	44.6	55.4
Commercial Union Insurance Co.	54,545	16,314	29.9	2.4	16.6	1.0	8.5	3.4	31.9	68.1
Hallmark Insurance Co.	52,569	30,314	57.7	6.6	14.8	30.8	7.8	5.9	68.4	31.6
Hartford Fire Insurance Co.	50,115	5,272	10.5	5.2	20.2	2.1	13.4	3.3	44.2	55.8
Employers Mutual Liability Insurance Co.	47,269	0	0.0	6.1	9.6	13.0	17.4	4.5	50.7	49.3
Home Insurance Co.	46,653	4,839	10.4	4.7	17.3	2.3	9.3	3.3	36.9	63.1
Unigard Mutual Insurance Co.	36,127	799,619	2188.4	4.7	21.8	4.6	6.1	2.3	39.5	60.5
New Hampshire Insurance Co.	32,172	160,919	525.1	4.8	20.7	4.5	2.9	3.6	36.0	64.0
Horace Mann Insurance Co.	28,193	494	1.8	6.7	20.2	6.2	2.9	3.1	39.1	60.9
U.S.A.A.	27,927	0	0.0	5.4	1.4	20.4	5.0	3.7	35.9	64.1
Lumberman's Underwriting Alliance	26,019	0	0.0	2.8	24.2	1	2.8	2.1	32.2	67.8
Aetna Casualty & Surety Co.	25,514	177	0.7	3.1	21.0	2.1	10.4	3.2	33.7	60.3
American Motorists Insurance Co.	24,670	44,000	178.4	4.1	21.7	3.8	6.9	2.8	40.3	59.7
Total (95.4% of all business) - Average	\$ 8,776,601	\$ 6,515,260	74.6	4.8	17.4	4.1	6.8	4.2	37.3	62.7
Total All Companies	\$ 9,147,766	\$ 6,653,254	72.7							

¹State Farm Fire & Casualty Figures

Insurance Report
1975-76
Company Expense
Exhibits 1975-76
R. Rainey 11/77

Exhibit III

Alaska Top 20 Homeowner Insurance Writers Experience - 1972

Company	Earned Premium	Incurred Losses	Loss Ratio
State Farm Fire & Casualty	\$1,253,712	\$ 535,050	46.4
Insurance Company of N. America	1,217,955	693,785	57.4
Allstate Insurance Co.	661,041	171,395	25.9
Fireman's Fund Insurance Co.	474,810	261,092	55.3
Great American Insurance Co.	345,720	193,712	56.0
New Hampshire Insurance Co.	318,726	303,406	97.1
United States Fire Insurance Co.	274,954	292,116	106.3
U.S. Fidelity & Guaranty Co.	198,718	45,941	23.1
Pacific Insurance Co.	180,440	26,440	14.7
State Farm General Insurance Co.	140,097	116,655	82.8
Hartford Fire Insurance Co.	131,665	48,549	36.3
Home Insurance Co.	100,453	89,428	89.3
Employers Commercial Union Insurance Co.	99,352	12,224	12.3
American Motorists Insurance Co.	88,514	19,719	22.3
Consolidated Underwriters	83,912	29,840	35.6
All-American Insurance Co.	79,341	7,407	9.3
American Manufacturers Mutual Insurance Co.	63,205	23,386	37.0
Horace Mann Insurance Co.	57,766	7,196	12.5
United Services Automobile Association	51,585	3,127	6.1
Jefferson Insurance Co. of N.Y.	51,515	40,575	78.7
Total (95.7% of all business)	\$5,879,391	\$3,031,443	51.7
Total All Cos.	\$6,141,678	\$3,142,624	51.2

Alaska Top 20 Homeowner Insurance Writers Experience - 1975

Company	Earned Premium	Incurred Losses	Loss Ratio
State Farm Fire & Casualty Co.	\$ 2,780,754	\$1,772,812	63.8
Insurance Company of N. America	1,998,659	987,004	49.4
Allstate Insurance Co.	1,256,863	663,942	53.3
Pacific Insurance Co.	524,250	110,241	21.0
Great American Insurance Co.	508,978	301,391	59.2
Providence Washington Insurance Co. of Alaska	474,540	252,496	53.2
Fireman's Fund Insurance Co.	357,409	115,046	32.2
State Farm General Insurance Co.	340,605	189,930	55.8
Industrial Indemnity Co. of Alaska	323,875	287,365	88.7
North West Insurance Co.	172,537	36,710	21.3
Horace Mann Insurance Co.	162,072	58,242	35.9
Associated Indemnity Corp.	150,690	73,956	49.1
United Services Automobile Assoc.	129,002	78,475	60.1
New Hampshire Insurance Co.	126,238	11,467	9.1
American Motorists Insurance Co.	114,491	18,336	16.0
All-American Insurance Co.	111,898	5,668	5.1
Alaska Insurance Co.	73,651	28,549	38.6
Providence Washington Insurance Company	71,770	77,192	107.6
Nationwide Mutual Fire Insurance Co.	71,734	99,086	138.1
Hallmark Insurance Co.	50,291	27,833	55.3
Total (96.9% of all business)	\$ 9,800,307	\$5,201,741	53.1
Total All Cos.	\$10,114,704	\$5,367,178	53.1

Alaska Top 20 Homeowner Insurance Writers Experience - 1973

Company	Earned Premium	Incurred Losses	Loss Ratio
Insurance Co. of N. America	\$ 1,730,074	\$ 882,719	51.0
State Farm Fire & Casualty Co.	1,504,038	714,315	47.5
Allstate Insurance Co.	827,701	397,993	48.1
Fireman's Fund Insurance Co.	531,526	290,013	54.6
Great American Insurance Co.	356,662	87,193	24.5
Pacific Insurance Co.	321,576	79,770	24.8
U.S. Fire Insurance Co.	297,604	145,176	48.8
New Hampshire Insurance Co.	242,760	221,066	91.1
State Farm General Insurance Co.	170,878	84,780	49.6
Home Insurance Co.	117,720	1,964	1.7
American Motorist Insurance Co.	114,981	86,506	75.3
Hartford Fire Insurance Co.	110,566	93,645	84.7
U.S. Fidelity & Guaranty Co.	92,995	38,193	41.1
Providence Washington Insurance Co. of Alaska	90,029	13,036	14.5
Commercial Union Insurance Co.	85,046	17,144	20.0
United States Automobile Association	84,473	10,517	12.5
All-American Insurance Co.	72,839	42,070	57.8
Horace Mann Insurance Co.	71,559	22,846	31.9
Jefferson Insurance Co.	64,249	705	1.1
Medallion Insurance Co.	53,727	4,402	8.3
Total (95.6% of all business)	\$6,941,821	\$3,234,205	46.6
Total All Cos.	\$7,261,938	\$3,459,525	47.6

Alaska Top 20 Homeowners Insurance Writers Experience - 1976

Company	Earned Premium	Incurred Losses	Loss Ratio
State Farm Fire & Casualty Co.	\$ 3,986,852	\$1,612,156	40.4
Insurance Company of N. America	2,221,764	871,765	39.2
Allstate Insurance Co.	1,675,553	542,182	32.4
Great American Insurance Co.	810,122	433,259	53.5
Pacific Insurance Co.	633,259	405,238	64.0
Fireman's Fund Insurance Co.	450,783	61,607	13.7
State Farm General Insurance Co.	435,382	222,740	51.2
Industrial Indemnity Co. of Alaska	358,856	55,292	15.4
Horace Mann Insurance Co.	290,458	344,964	118.8
Providence Washington Insurance Co. of Alaska	283,110	279,126	98.6
Associated Indemnity Corp.	269,610	109,970	40.9
North West Insurance Co.	215,419	182,020	84.5
United Services Automobile Assoc.	162,626	30,348	18.7
New Hampshire Insurance Co.	161,759	34,489	21.3
American Motorists Insurance Co.	135,515	43,558	32.1
Nationwide Mutual Fire Insurance Co.	76,054	6,282	8.3
All-American Insurance Co.	56,117	19,394	34.6
Hallmark Insurance Co.	52,863	2,374	4.5
Providence Washington Insurance Co.	43,922	127,285	289.8
Hartford Fire Insurance Co.	37,435	6,046	16.2
Total (97.2% of all business)	\$12,357,509	\$5,390,143	43.6
Total All Cos.	\$12,715,608	\$5,581,144	43.9

Alaska Top 20 Homeowner Insurance Writers Experience - 1974

Company	Earned Premium	Incurred Losses	Loss Ratio
Insurance Co. of N. America	\$1,989,768	\$1,301,104	65.4
State Farm Fire & Casualty Co.	1,808,616	790,276	43.4
Allstate Insurance Co.	963,546	392,489	40.7
Pacific Insurance Co.	434,351	182,104	41.9
Fireman's Fund Insurance Co.	413,614	52,434	12.7
Providence Washington Insurance Co. of Alaska	396,569	162,147	40.9
Great American Insurance Co.	311,711	220,601	71.3
Industrial Indemnity Co. of Alaska	232,007	85,788	36.8
State Farm General Insurance Co.	210,921	81,137	38.5
Alaska Insurance Co.	162,813	48,025	30.0
U.S. Fire Insurance Co.	151,547	118,137	78.0
American Motorists Insurance Co.	127,034	58,267	45.9
United Services Automobile Association	109,783	10,070	9.2
Horace Mann Insurance Co.	95,953	14,220	14.7
All-American Insurance Co.	88,072	93,916	106.7
Home Insurance Co.	85,054	1,394	1.6
New Hampshire Insurance Co.	81,976	163,375	199.3
Hartford Fire Insurance Co.	76,597	53,001	70.2
Nationwide Mutual Fire Insurance Co.	50,894	13,161	22.4
Jefferson Insurance Co.	44,079	2,019	4.6
Total (96.1% of all business)	\$7,945,275	\$3,853,343	48.5
Total All Cos.	\$8,267,918	\$4,059,395	49.1

Alaska Top 20 Homeowners Insurance Writers Experience -

Company	5 Years (1972-76)		Loss Ratio
	Earned Premium	Incurred Losses	
State Farm Fire & Casualty Co.	\$11,440,027	\$ 5,474,609	47.9
Insurance Company of N. America	9,158,230	4,740,377	51.8
Allstate Insurance Co.	5,384,704	2,173,991	40.4
Great American Insurance Co.	2,333,133	1,244,196	53.3
Fireman's Fund Insurance Co.	2,228,142	780,192	35.0
Pacific Insurance Co.	2,094,376	803,793	38.4
State Farm General Insurance Co.	1,297,833	694,642	53.5
Providence Washington Insurance Co. of Alaska	1,244,240	706,805	56.8
Industrial Indemnity Co. of Alaska	941,357	431,353	45.3
New Hampshire Insurance Co.	931,467	739,103	79.4
U.S. Fire Insurance Co.	778,284	622,675	80.0
Horace Mann Insurance Co.	670,808	498,038	73.4
American Motorists Insurance Co.	580,535	276,466	47.6
United Services Automobile Assoc.	537,469	160,688	29.9
Associated Indemnity Corp.	469,471	193,343	42.2
All-American Insurance Co.	408,267	160,525	41.3
Hartford Fire Insurance Co.	405,290	233,531	57.6
U.S. Fidelity & Guaranty Co.	404,549	162,217	40.1
North West Insurance Co.	307,956	219,738	56.8
Home Insurance Co.	362,079	101,021	27.9
Total (92.1% of all business)	\$42,066,220	\$20,211,477	48.0
Total All Cos.	\$45,689,532	\$21,948,089	48.0

Exhibit IV

1975 - ALASKA HOMEOWNERS INSURANCE EXPERIENCE AND EXPENSES

Company	Earned Premiums	Incurred Losses	Loss Ratio	Loss Adjust. Expenses	Commission Brokerage	Other Acq. Field Super. Collection	General Expenses	Taxes Licenses Fees	Total Expenses Incurred	Resultant Permissible Loss Ratio
State Farm Fire & Casualty Co.	\$2,780,754	\$1,772,812	63.8%	6.9	20.8	4.5	4.8	2.8	39.8	60.2
Insurance Company of North America	1,998,659	987,004	49.4	7.7	21.2	5.1	8.1	3.3	45.4	54.5
Allstate Insurance Co.	1,256,863	669,942	53.3	8.2	9.5	8.0	4.0	3.8	33.5	66.5
Pacific Insurance Co.	524,250	110,241	21.0	7.0	25.3	3.2	6.6	2.6	41.5	58.5
Great American Insurance Co.	508,978	301,391	59.2	5.2	23.0	3.1	5.0	2.8	39.1	60.9
Providence Washington Insurance Co. of Alaska	474,540	252,496	53.2	10.0	19.6	4.8	7.4	2.6	44.4	55.6
Fireman's Fund Insurance Co.	357,409	115,046	32.2	8.3	21.1	5.2	7.7	3.2	45.5	54.5
State Farm General Insurance Co.	340,605	189,930	55.8	7.1	19.5	5.0	5.3	2.9	39.8	60.2
Industrial Indemnity Co. of Alaska	323,875	287,365	88.7	7.5	21.0	2.5	6.4	2.4	39.8	60.2
North West Insurance Co.	172,537	36,710	21.3	6.3	25.0	0.0	11.6	2.3	43.8	56.2
Horace Mann Insurance Co.	162,072	58,242	35.9	7.3	18.4	8.0	7.1	4.5	45.1	54.7
Associated Indemnity Corp.	150,690	73,956	49.1	8.3	21.1	5.2	7.7	3.2	45.5	54.5
U.S.A.A.	129,002	78,475	60.1	8.3	0.3	15.6	6.9	3.4	34.4	65.6
New Hampshire Insurance Co.	126,238	11,467	9.1	10.5	21.1	3.2	3.4	2.8	41.0	59.0
American Motorists Insurance Co.	114,491	18,336	16.0	6.8	26.1	8.6	5.0	3.2	50.0	50.0
All-America Insurance Co.	111,898	5,668	5.1	8.2	36.7	.8	.9	.7	47.3	52.7
Alaska Insurance Co.	73,651	28,549	38.6	10.5	21.1	3.2	3.4	2.8	41.0	59.0
Providence Washington Insurance Co.	71,770	77,192	107.6	10.0	19.6	4.8	7.4	2.6	44.4	55.6
Nationwide Mutual Fire Insurance Co.	71,734	99,086	138.1	8.6	14.5	12.6	6.0	3.9	45.6	54.4
Total (96.4% of all business) - Average	\$ 9,750,016	\$5,173,908	53.1	7.5	19.7	5.1	6.0	3.0	41.3	58.7
Total All Companies	\$70,114,704	\$5,367,178	53.1							

1976 - ALASKA HOMEOWNERS INSURANCE EXPERIENCE AND EXPENSES

Company	Earned Premiums	Incurred Losses	Loss Ratio	Loss Adjust. Expenses	Commission Brokerage	Other Acq. Field Super. Collection	General Expenses	Taxes Licenses Fees	Total Expenses Incurred	Resultant Permissible Loss Ratio
State Farm Fire & Casualty Co.	\$ 3,986,852	\$1,612,156	40.4%	6.4	20.6	5.3	3.9	3.0	39.2%	60.8%
Insurance Co. of North America	2,221,764	871,765	39.2	7.7	22.7	3.3	7.7	3.3	44.8	55.2
Allstate Insurance Co.	1,675,553	542,182	32.4	7.9	9.2	7.4	3.7	4.0	32.2	67.8
Great American Insurance Co.	810,172	433,299	53.5	4.2	21.3	4.0	5.3	2.1	37.2	62.7
Pacific Insurance Co.	633,259	405,238	64.0	5.5	23.2	2.7	6.9	2.3	40.6	59.4
Fireman's Fund Insurance Co.	450,783	61,607	13.7	7.9	20.9	5.2	7.4	3.2	44.6	55.4
State Farm General Insurance Co.	435,382	222,740	51.2	6.4	20.6	5.3	3.9	3.0	39.7	60.8
Industrial Indemnity Company of Alaska	358,856	55,292	15.4	7.0	22.3	2.0	5.4	2.8	39.5	60.5
Horace Mann Insurance Co.	290,450	344,964	118.8	8.3	21.5	6.7	3.1	3.3	42.9	57.1
Providence Washington Insurance Co. of Alaska	283,110	279,126	98.6	9.1	16.9	3.7	7.2	2.4	39.3	60.7
Associated Indemnity Corp.	269,610	109,970	40.9	7.9	20.9	5.2	7.4	3.2	44.6	55.4
North West Insurance Co.	215,419	102,078	47.4	12.6	17.8	0.0	3.6	1.6	35.7	64.3
U.S.A.A.	162,626	30,348	18.7	7.7	0.3	19.9	2.5	3.8	34.2	65.8
New Hampshire Insurance Co.	161,759	34,489	21.3	10.0	20.0	4.6	3.5	2.6	40.7	59.3
American Motorists Insurance Co.	135,515	43,558	32.1	5.6	26.1	4.0	5.1	2.4	43.2	56.8
Nationwide Mutual Fire Insurance Co.	76,054	6,202	8.3	0.6	9.5	12.1	6.4	4.4	41.0	59.0
All America Insurance Co.	56,117	19,374	34.6	4.6	39.1	1.3	1.8	.7	47.5	52.5
Hallmark Insurance Co.	52,861	2,374	4.5	15.1	45.4	32.7	6.6	5.1	108.9	(4.9)
Providence Washington Insurance Co.	43,922	127,285	289.8	9.1	16.2	3.7	7.2	2.4	39.3	60.7
Hartford Fire Insurance Co.	37,435	6,048	16.2	7.6	21.2	3.0	7.4	3.3	42.5	57.5
Total (97.2% of all business) - Average	\$12,357,509	\$5,390,143	43.6	7.1	19.5	5.1	5.1	3.1	39.9	60.1
Total All Companies	\$12,715,088	\$5,581,144	43.9							

Exhibit V

Companies Reporting Fire Insurance Experience by Dwelling Commercial Categories

1972

Company	Dwelling Fire			Commercial Fire			Total		
	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio
Continental Insurance Group	229,134	68,826	30.0	417,428	104,065	24.9	646,562	172,891	26.7
Highlands Insurance Co.	17,714	0	0.0	468,926	502,784	107.2	486,640	503,784	103.3
Fireman's Fund Insurance Cos.	-	-	-	464,987	206,303	44.4	464,987	206,303	44.4
Hartford Fire Insurance Co.	107,736	43,741	40.6	230,557	92,223	40.0	338,293	135,994	40.2
Great American Insurance Co.	7,820	0	0.0	322,791	230,795	71.5	330,611	230,795	69.8
United States Fidelity & Guaranty Co.	111,608	35,289	31.6	202,320	108,008	53.4	313,928	143,837	45.8
St. Paul Insurance Cos.	-	-	-	66,097	21,914	33.2	66,097	21,914	33.2
Mission Insurance Co.	-	-	-	55,222	4,068	7.4	55,222	4,068	7.4
American Home Assurance Co.	156	0	0.0	40,403	30,088	74.2	40,559	30,088	74.2
National Union Fire Insurance Co.	-	-	-	3,458	0	0.0	3,458	0	0.0
Industrial Indemnity Group	-	-	-	624	0	0.0	624	0	0.0
Total (37.5% of all business)	474,168	147,856	31.2	2,272,813	1,300,248	57.2	2,746,981	1,448,114	52.7
Total All Companies							7,329,884	3,480,847	47.5

1973

Continental Insurance Group	249,177	80,736	32.4	331,516	61,904	18.7	580,693	142,640	24.6
Highlands Insurance Co.	4,804	0	0.0	550,649	32,954	6.0	555,453	32,954	5.9
Industrial Indemnity Group	137,623	64,552	46.9	361,034	(20,881)	(5.8)	498,657	43,671	8.8
Fireman's Fund Insurance Co.	-	-	-	408,379	61,937	15.2	408,379	61,937	15.2
Alaska Insurance Co.	65,379	17,265	26.4	208,711	45,205	21.7	274,090	62,460	22.8
Mission Insurance Co.	-	-	-	263,222	1,231,806	468.0	263,222	1,231,806	468.0
Great American Insurance Co.	27,292	26,002	95.3	230,200	85,573	37.2	257,492	111,575	43.3
Hartford Fire Insurance Co.	50,823	2,897	5.7	155,176	90,315	58.0	205,999	93,212	45.9
U.S. Fidelity & Guaranty Co.	70,352	80,775	114.8	124,980	24,699	19.8	195,332	105,474	54.0
Atlas Assurance Co.	5,265	2,400	45.6	94,023	139	0.1	100,088	2,539	2.5
St. Paul Insurance Cos.	-	-	-	85,369	985	1.2	85,369	985	1.2
American Home Assurance Co.	88	0	0.0	24,066	0	0.0	24,154	0	0.0
National Union Fire Insurance Co.	-	-	-	5,715	162	2.8	5,715	162	2.8
Total (43.8% of all business)	610,803	274,627	45.0	2,843,840	1,614,798	56.8	3,454,743	1,889,415	54.7
Total All Companies							7,893,318	2,721,742	34.4

1974

Company	Dwelling Fire			Commercial Fire			Total		
	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio
Industrial Indemnity Group	258,011	0	0.0	760,099	149,502	19.7	1,018,110	149,502	14.7
Mission Insurance Co.	-	-	-	869,865	19,193	2.2	869,865	19,193	2.2
Continental Insurance Group	238,583	141,846	59.4	313,676	41,485	13.2	552,259	183,331	33.2
Alaska Insurance Co.	151,365	28,039	18.5	380,619	154,578	40.6	531,984	182,617	34.3
Highlands Insurance Co.	10,603	0	0.0	501,183	190,904	38.1	511,786	190,904	37.3
Fireman's Fund Insurance Co.	21,070	0	0.0	306,147	35,121	11.5	327,217	35,121	10.7
Great American Insurance Co.	38,529	0	0.0	143,754	60,704	42.2	182,283	60,704	33.3
Atlas Assurance Co.	13,744	0	0.0	126,842	104,000	82.0	140,586	104,000	74.0
Hartford Fire Insurance Co.	40,894	(5,194)	(12.7)	93,906	11,269	12.0	134,800	6,075	4.5
St. Paul Insurance Cos.	-	-	-	117,076	6,815	5.8	117,076	6,815	5.8
U.S. Fidelity & Guaranty Co.	50,640	2,418	4.8	56,930	820	1.4	107,570	3,238	3.0
American Home Assurance Co.	63	0	0.0	16,130	85,000	527.0	16,193	85,000	525.0
National Union Fire Insurance Co.	-	-	-	9,254	0	0.0	9,254	0	0.0
Total (53.4% of all business)	823,502	167,109	20.3	3,695,401	859,471	23.3	4,518,983	1,026,500	22.7
Total All Companies							8,467,152	1,786,314	21.0

1975

Industrial Indemnity Group	269,187	0	0.0	861,455	450,414	52.3	1,130,642	450,414	39.8
Alaska Insurance Co.	260,720	16,063	6.2	737,443	274,036	37.2	998,163	290,099	29.1
Continental Insurance Group	300,804	143,834	47.8	382,782	819,267	219.3	683,586	983,101	143.8
Highlands Insurance Co.	30,750	0	0.0	356,595	78,374	22.0	387,345	78,374	20.2
Fireman's Fund Insurance Cos.	36,514	0	0.0	302,463	21,034	7.0	338,977	21,034	6.2
Great American Insurance Co.	70,000	75,000	107.1	226,429	28,154	12.4	296,429	103,154	34.8
Mission Insurance Co.	-	-	-	166,385	30,828	18.5	166,385	30,828	18.5
National Union Fire Insurance Co.	-	-	-	90,859	50,000	55.0	90,859	50,000	55.0
U.S. Fidelity & Guaranty Co.	53,666	18,072	33.7	36,502	16,933	46.3	90,168	35,005	38.8
Hartford Fire Insurance Co.	19,768	95,203	481.6	41,706	5,005	12.0	61,474	100,208	163.0
Atlas Assurance Co.	8,435	1,800	21.3	45,800	33,609	73.4	54,235	35,409	65.3
American Home Assurance Co.	30	0	0.0	3,699	0	0.0	3,729	0	0.0
St. Paul Insurance Cos.	-	-	-	729,516	51,995	40.1	129,516	51,995	40.1
Total (51.8% of all business)	1,049,874	349,972	33.3	3,381,634	1,879,649	55.6	4,431,508	2,229,621	50.3
Total All Companies							8,553,533	4,360,129	51.0

1976

Company	Dwelling Fire			Commercial Fire			Total		
	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio
Alaska Insurance Co.	309,099	3,470	1.1	1,175,102	222,707	19.0	1,484,201	226,177	15.2
Industrial Indemnity Group	234,645	115,055	49.0	658,332	227,981	34.6	892,977	343,036	38.4
Continental Insurance Co.	282,470	218,666	77.4	335,744	263,472	78.5	618,214	482,138	78.0
Great American Insurance Co.	97,000	26,000	26.8	358,194	185,122	51.7	455,194	211,122	46.4
Fireman's Fund Insurance Co.	43,587	13,500	31.0	361,975	109,264	30.2	405,562	122,764	30.3
Mission Insurance Co.	-	-	-	292,384	449	0.2	292,384	449	0.2
Highlands Insurance Co.	13,152	0	0.0	222,219	25,063	11.3	235,371	25,063	10.6
St. Paul Insurance Cos.	-	-	-	195,997	28,888	14.7	195,997	28,888	14.7
Atlas Assurance Co.	75,527	379	0.5	114,395	10,150	8.9	189,922	10,529	5.5
National Union Fire Insurance Co.	-	-	-	135,434	1,030	1.0	105,434	1,030	1.0
United States Fidelity & Guaranty Co.	48,472	11,431	23.8	38,996	(437)	(1.1)	87,468	10,994	12.6
Hartford Fire Insurance Co.	33,138	6,860	20.7	17,224	689	4.0	50,362	7,549	15.0
American Home Assurance Co.	-	-	-	1,592	0	0.0	1,592	0	0.0
Total (54.8% of all business)	1,137,090	395,451	34.8	3,877,588	1,074,378	27.6	5,014,678	1,469,739	29.3
Total All Companies							9,147,766	6,653,254	72.7

1972-76 TOTALS

Industrial Indemnity Group	899,466	179,607	20.0	2,641,544	807,016	30.6	3,541,010	986,623	27.9
Alaska Insurance Co.	786,563	64,837	8.2	2,501,875	696,526	27.8	3,288,438	761,363	23.2
Continental Insurance Co.	1,300,168	653,908	50.3	1,781,146	1,310,193	73.6	3,081,314	1,964,101	63.7
Highlands Insurance Co.	77,023	0	0.0	2,099,572	830,159	39.5	2,176,595	830,159	38.1
Fireman's Fund Insurance Cos.	101,171	13,500	13.3	1,843,951	433,659	23.5	1,945,122	447,159	23.0
Mission Insurance Co.	-	-	-	1,647,078	1,206,344	73.1	1,647,078	1,286,344	78.1
Great American Insurance Co.	240,641	136,421	56.7	1,281,368	590,348	46.1	1,522,009	726,769	47.8
United States Fidelity & Guaranty Co.	334,738	147,985	44.2	459,728	150,023	32.6	794,466	298,008	37.5
Hartford Fire Insurance Co.	252,359	143,507	56.9	538,569	199,501	37.0	790,928	343,008	43.4
St. Paul Insurance Cos.	-	-	-	624,694	110,597	17.7	624,694	110,597	17.7
Atlas Assurance Co.	102,971	4,579	4.4	381,860	147,898	38.7	484,831	152,477	31.4
National Union Fire Insurance Co.	-	-	-	214,720	51,192	23.8	214,720	51,192	23.8
American Home Assurance Co.	337	0	0.0	85,890	115,088	134.0	86,235	115,088	133.5
Total (48.8% of all business)	4,095,100	1,344,344	32.8	16,101,995	6,728,544	41.8	20,197,440	8,072,888	40.0
Total All Companies							41,391,653	19,002,206	45.9

Information submitted by companies
R. Rainery 11/77

Exhibit VI

ALASKA HOMEOWNERS INSURANCE EXPERIENCE

Companies Reporting by Zone

Company	1972								
	Zone 1*			Zone 2*			Total		
	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio
State Farm Fire & Casualty Co.	\$ 91,877	\$ 32,227**	35.1%	\$ 1,167,835	\$ 613,729**	52.6%	\$ 1,259,712	\$ 645,956**	51.3%
Insurance Co. of North America	187,743	84,873	45.2	1,018,899	702,180	68.9	1,206,642	787,053	65.2
Allstate Insurance Co.	13,263	6,197	46.7	639,067	188,463	29.5	652,330	194,660	29.8
State Farm General Insurance Co.	6,450	524**	8.1	97,997	119,209**	121.6	104,447	119,733**	114.6
Total (52.5% of all business)	\$299,333	\$ 123,821	41.4%	\$ 2,923,798	\$ 1,623,581	55.5%	\$ 3,223,131	\$ 1,747,402	54.2%
Total All Companies							\$ 6,141,678	\$ 3,142,624	51.2%
	1973								
Insurance Co. of North America	290,954	110,104	37.3	1,431,120	786,242	54.9	1,722,074	896,346	52.0
State Farm Fire & Casualty Co.	124,787	19,525**	15.6	1,379,301	757,489**	54.9	1,504,083	777,014**	51.7
Allstate Insurance Co.	22,325	10,605	47.5	804,146	454,661	56.5	826,471	465,266	56.3
State Farm General Insurance Co.	6,610	35**	0.5	112,662	49,451**	43.9	119,272	49,486**	41.5
Total (57.4% of all business)	444,676	140,269	31.5	3,727,229	2,047,843	54.9	4,171,905	2,188,112	52.4
Total All Companies							7,261,938	3,459,525	47.6
	1974								
Insurance Co. of North America	382,187	615,228	160.9	1,603,204	739,633	46.1	1,985,391	1,354,861	68.2
State Farm Fire & Casualty Co.	168,223	40,798**	24.3	1,740,393	816,274**	46.9	1,908,616	857,072**	44.9
Allstate Farm Fire & Casualty Co.	28,329	5,081	17.9	923,884	447,384	48.4	952,263	452,465	47.5
State Farm General Insurance Co.	6,388	1,213**	19.0	95,444	46,800**	49.0	101,632	48,013**	47.1
Total (59.8% of all business)	505,127	657,747	112.4	4,362,925	2,049,662	47.0	4,948,102	2,707,409	54.7
Total of All Companies							8,267,918	4,059,395	49.1
	1975								
Company	Zone 1*			Zone 2*			Total		
	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio	Earned Premium	Incurred Losses	Loss Ratio
State Farm Fire & Casualty Co.	\$ 232,030	\$ 161,323**	43.7%	\$ 2,548,724	\$ 1,806,002**	70.9%	\$ 2,780,754	\$ 1,909,325**	68.7%
Insurance Co. of North America	421,583	217,524	68.2	1,571,050	581,521	37.0	1,992,633	869,045	43.6
Allstate Insurance Co.	62,055	11,028	17.8	1,081,687	760,768	70.3	1,143,662	771,706	67.5
State Farm General Insurance Co.	7,252	947**	13.1	74,593	23,056	44.3	81,845	34,003**	41.5
Total (59.3% of all business)	722,920	400,822	55.4	5,275,974	3,103,347	60.3	5,998,894	3,584,169	59.7
Total All Companies							10,114,704	5,367,178	53.1
	1976								
State Farm Fire & Casualty Co.	307,126	228,823**	74.5	3,679,727	1,556,547**	42.3	3,986,853	1,785,370**	44.8
Insurance Co. of North America	468,857	65,953	14.1	1,746,945	886,528	50.7	2,215,802	952,481	43.2
Allstate Insurance Co.	117,485	11,660	9.9	1,347,125	615,836	45.7	1,464,610	627,496	42.9
State Farm General Insurance Co.	1,268	538**	42.4	18,876	22,448**	118.9	20,144	22,986	114.1
Total (60.5% of all business)	894,736	306,974	34.3	6,792,673	3,081,359	45.4	7,687,409	3,398,333	44.1
Total All Companies							12,715,088	5,581,144	43.9
	1972-1976								
State Farm Fire & Casualty Co.	924,043	422,696**	45.7	10,515,980	5,552,041**	52.8	11,440,023	5,974,737**	52.2
Insurance Co. of North America	1,751,324	1,163,602	66.2	7,371,218	3,696,104	50.1	9,122,542	4,859,786	53.3
Allstate Insurance Co.	243,507	44,571	18.3	4,795,029	2,467,112	51.4	5,039,336	2,511,683	49.8
State Farm General Insurance Co.	27,968	3,257**	11.6	399,572	270,964**	67.8	427,540	274,221**	64.1
Total (57.0% of all business)	2,946,752	1,634,206	55.6	23,002,599	11,986,221	51.9	26,029,351	13,629,427	52.3
Total All Companies							45,689,532	21,948,089	48.0

* Zone 1 - Same for all companies (all of State East of 141st meridian of West longitude)

* Zone 2 - State Farm Zone 2 (all of remainder of State except zip code areas 99701-99799)
State Farm Zone 3 (zip code areas 99701-99799)

Insurance Co. of North America Zone 2 (Matanuska-Susitna and Greater Anchorage Area Boroughs and Kodiak Island)

Insurance Co. of North America Zone 3 (all of remainder of State)

** Includes Loss Adjustment Expenses.

Information submitted by companies
R. Rainery 9/77

Exhibit VII

ISO FIRE RATES

District I Class D - Dwelling Building - Owner Occupied

Amount of Insurance	Protection Class					
	5	6	7	8	9	10
\$ 40,000	173	198	267	338	422	458
\$ 70,000	303	347	467	591	738	801
\$100,000	433	496	667	844	1055	1144

District I Class D - Dwelling Contents

Amount of Insurance	Protection Class					
	5	6	7	8	9	10
\$ 20,000	91	104	139	174	216	229
\$ 35,000	160	183	243	305	379	400
\$ 50,000	228	261	347	436	541	572

District II Class D - Dwelling Building - Owner Occupied

Amount of Insurance	Protection Class							
	3	4	5	6	7	8	9	10
\$ 40,000	173	198	224	259	316	438	549	595
\$ 70,000	303	347	391	454	605	767	961	1042
\$100,000	433	496	559	648	864	1095	1373	1488

District II Class D - Dwelling Contents

Amount of Insurance	Protection Class							
	3	4	5	6	7	8	9	10
\$ 20,000	92	104	117	135	178	224	280	298
\$ 35,000	160	183	205	235	312	392	489	521
\$ 50,000	229	261	293	337	445	559	699	744

Rates compiled from manual on file
with the Division of Insurance and
confirmed by ISO.
R. Rainery 11/77

Exhibit VIII

Homeowners Insurance Rates

Policy - HO - 3 (or nearest equivalent)

Construction - Frame

Premium - Annual (\$100 deductible)

1. Home Insured for \$ 40,000
2. Home Insured for \$ 70,000
3. Home Insured for \$ 100,000

1. Anchorage

Company	Protection Class			
	5	8	9	10
Fireman's Fund	\$ 278	\$ 306	\$ 487	\$ 556
Providence Washington of Ak.	167	199	341	389
Horace Mann	202	315	559	559
Allstate	183	292	360	360
Industrial Indemnity Co. of Ak.	263	437	629	629
Insurance Co. of North America	250	414	550	550
State Farm Fire & Casualty	204	308	424	424
State Farm General	294	456	559	559
Great American	300	467	572	572
Pacific	278	306	487	556

2. Juneau

Company	Protection Class			
	5	6	7	10
Fireman's Fund	556	556	613	1,112
Providence Washington of Ak.	334	361	398	778
Horace Mann	312	337	407	863
Allstate	270	282	339	502
Industrial Indemnity of Ak.	500	571	826	1,188
Insurance Co. of North America	440	466	555	895
State Farm Fire & Casualty	283	295	345	508
State Farm General	485	507	598	864
Great American	566	612	740	1,031
Pacific	556	556	613	1,112

1. Fairbanks

Company	Protection Class			
	4	5	8	10
Fireman's Fund	278	278	306	556
Providence Washington of Ak.	167	167	199	389
Horace Mann	200	218	340	559
Allstate	166	183	292	360
Industrial Indemnity Co. of Ak.	242	263	437	629
Insurance Co. of North America	284	302	498	662
State Farm Fire & Casualty	204	223	337	526
State Farm General	294	323	502	699
Great American	346	375	583	716
Pacific	278	278	306	556

3. Anchorage

Company	Protection Class			
	5	8	9	10
Fireman's Fund	823	910	1,445	1,650
Providence Washington of Ak.	494	592	1,012	1,155
Horace Mann	456	714	1,271	1,271
Allstate	442	713	889	889
Industrial Indemnity of Ak.	734	1,216	1,747	1,747
Insurance Co. of North America	688	1,135	1,513	1,513
State Farm Fire & Casualty	485	741	902	902
State Farm General	822	1,272	1,555	1,555
Great American	831	1,297	1,591	1,591
Pacific	823	910	1,445	1,650

1. Juneau

Company	Protection Class			
	5	6	7	10
Fireman's Fund	278	278	306	556
Providence Washington of Ak.	167	181	199	389
Horace Mann	202	218	264	559
Allstate	157	166	199	292
Industrial Indemnity of Ak.	263	285	437	629
Insurance Co. of North America	220	252	300	484
State Farm Fire & Casualty	180	187	218	308
State Farm General	257	267	316	456
Great American	300	324	392	572
Pacific	278	278	306	556

3. Fairbanks

Company	Protection Class			
	4	5	8	10
Fireman's Fund	823	823	910	1,650
Providence Washington of Ak.	494	494	592	1,155
Horace Mann	453	493	771	1,271
Allstate	398	442	713	889
Industrial Indemnity of Ak.	675	734	1,216	1,747
Insurance Co. of North America	781	831	1,370	1,821
State Farm Fire & Casualty	485	532	814	1,124
State Farm General	822	904	1,399	1,994
Great American	959	1,045	1,618	1,988
Pacific	823	910	1,445	1,650

2. Anchorage

Company	Protection Class			
	5	8	9	10
Fireman's Fund	556	613	975	1,112
Providence Washington of Ak.	334	398	681	778
Horace Mann	312	406	863	863
Allstate	312	502	625	625
Industrial Indemnity of Ak.	500	826	1,188	1,188
Insurance Co. of North America	463	766	1,018	1,018
State Farm Fire & Casualty	314	508	703	703
State Farm General	558	864	1,057	1,057
Great American	566	882	1,081	1,081
Pacific	556	613	975	1,112

3. Juneau

Company	Protection Class			
	5	6	7	10
Fireman's Fund	823	823	910	1,650
Providence Washington of Ak.	494	535	592	1,155
Horace Mann	456	497	567	1,271
Allstate	383	398	480	713
Industrial Indemnity of Ak.	734	841	1,216	1,747
Insurance Co. of North America	605	693	825	1,331
State Farm Fire & Casualty	387	404	474	741
State Farm General	713	747	880	1,272
Great American	831	900	1,088	1,591
Pacific	823	823	910	1,650

2. Fairbanks

Company	Protection Class			
	4	5	8	10
Fireman's Fund	556	556	613	1,112
Providence Washington of Ak.	334	334	398	778
Horace Mann	309	337	525	863
Allstate	282	312	502	625
Industrial Indemnity of Ak.	459	500	826	1,188
Insurance Co. of North America	525	559	921	1,225
State Farm Fire & Casualty	314	366	557	875
State Farm General	558	614	950	1,321
Great American	653	709	1,102	1,352
Pacific	556	556	613	1,112

Rates compiled from manuals on file with the Division of Insurance and confirmed by companies.

R. Rainery 11/77

Exhibit IX

ISO Premium Relativities - Dwelling Fire - Frame Bldg

<u>Protection Class</u>	<u>Statewide Current Relativities</u>	<u>Statewide Indicated Relativities</u>
3	.773	1.079
4	.884	1.000
5	1.000	1.000
6	1.155	1.000
7	1.542	.836
8	1.956	.836
9	2.447	1.195
10	2.654	1.348

ISO Fire filing of June 7, 1977

Exhibit X

ISO Dwelling Experience Compilation - Protection Standard Fire Policy

	Protected (Classes 1-8)			Unprotected (Classes 9 & 10)		
	<u>Earned Premiums</u>	<u>Incurred Losses</u>	<u>Loss Ratio</u>	<u>Earned Premiums</u>	<u>Incurred Losses</u>	<u>Loss Ratio</u>
1971	474,991	289,125	60.9	508,446	168,957	33.2
1972	456,014	205,009	45.0	526,474	170,967	32.5
1973	448,655	166,816	37.2	506,598	96,752	19.1
1974	510,136	197,089	38.6	587,118	84,009	14.3
1975	667,871	175,513	26.3	647,324	186,553	28.8
TOTAL	2,557,667	1,033,552	40.4	2,775,960	707,238	25.5

ISO 1976 Statistical Report, Personal Lines

Exhibit XI

Market Concentration Share

Alaska Homeowners Insurance

	<u>No. of Cos.</u>	<u>% of market share</u>
1972	5	64.5
1973	5	68.2
1974	5	69.1
1975	5	59.9
1976	5	73.4

Countrywide

	<u>No. of Grps</u>	<u>% of market share</u>
1976	26	64.8

Alaska Fire Insurance

	<u>No. of Cos.</u>	<u>% of market share</u>
1972	10	69.1
1973	10	58.7
1974	10	57.1
1975	10	59.6
1976	10	62.6

Countrywide

	<u>No. of Grps</u>	<u>% of market share</u>
1976	26	59.0

NAIC Competition Study, September 30, 1977
 Insurance Report 1972-76
 R. Rainery November 22, 1977

Exhibit XII

Alaska Fire Insurance Written Premiums

	Total (Admitted and Surplus)	Surplus	Surplus as % of Total
1972	\$8,817,563	\$976,882	11.1
1973	8,521,343	548,959	7.6
1974	9,523,474	965,537	10.1
1975	10,639,320	2,865,449	26.9
1976	13,796,608	4,522,479	32.8
Totals	\$51,298,308	\$9,979,306	19.5

Insurance Report 1972-76
 1/21/77 R. Rainery

HB

655

CHARLES POOL & ASSOCIATES, INC.
CONSULTING ENGINEERS & SURVEYORS
1225 Tongass Avenue
Ketchikan, Alaska 99901

file HB 655



(907) 225-6626

May 11, 1978

Honorable Terry Gardiner
Alaska House of Representatives
Pouch V
Juneau, Alaska 99811

Dear Mr. Gardiner:

We are writing to voice our opposition to HB 655, a bill for registration of Landscape Architects.

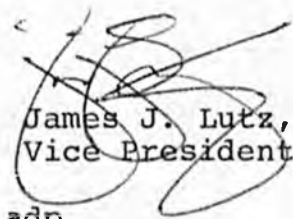
As presently written, this bill would license landscape architects to perform engineering and land surveying services which most landscape architects are manifestly unqualified to perform.

While we can see the need for regulating landscape architects and recognize the professional nature of their work, this bill would be akin to licensing chiropractors to do brain surgery.

We urge you to vote against this bill and to encourage your colleagues to do likewise.

Sincerely,

CHARLES POOL & ASSOCIATES, INC.

By:  James J. Lutz, P.E.
Vice President

JJL:adp

Alaska Society of Professional Engineers



DONALD R. DENT JR. P.E.
National Director
4135 Hood Court
Anchorage, Alaska 99503

Tel. (907) 277-8027
(907) 272-5451

March 16, 1978

Representative Terry Gardner
Chairman House Judiciary Committee
Pouch V
Juneau, AK 99811

Reference: HB 655

Subject: Registration of Landscape Architects

Dear Representative Gardner:

The Engineering groups, mostly in private practice, object to this piece of legislation, on the grounds that it will allow an infringement of a non-qualified group of people to practice within areas considered in Alaska and other States as Architecture, Civil Engineering and Land Surveying, as well as, leave the door open for other infringements on platting and planning processes, at the local level, which also effect the Land Surveying Professional.

In the proposed HB 655, under Section 30 (page 13) "practice of landscape architecture", the definition is vague enough that functions which are part of the practice of Architecture, Engineering and Surveying could be infringed with impunity, as is stated on line 8, "...but not limited to..." Specific infringements (lines 8 thru 11) "... consultation, investigation, research, planning, design, preparation of drawings, specifications and contract documents and responsible supervision or construction management in connection with the development of land;" (note semi-colon at end of this sentence.) At first reading it appears that the next sentence "to the extent,..." etc. is part of the aforementioned, but it is not. Lines 8 thru 13 is carte blanche license to do any or all A/E or L.S. work involved in land development.

Lines 12 thru 22 name specifics which are infringements.

Line 13 - "... or improvement of natural land features,..." A/E functions.

Line 14 - "... naturalistic or aesthetic values, or determination of proper land use..." A/E and L.S. Functions.

Line 16 - "... approaches for buildings and structures or other improvements..." This involves paving, parking, traffic pattern, sight distances, screening - "or other improvements" include sewer, water, power, site preparation, grading, etc. These are Engineering Functions.

Line 17 thru 20 - Please refer - This is a clear statement of supposed ability of landscape architects to do hydraulic and hydrologic engineering, as well as site engineering and soils analysis. These are Engineering Functions.

Representative Terry Gardner
March 16, 1978
Page -2-

Line 22 thru 24 - This states that landscape architecture does not include "design of buildings or structures with separate and self-contained purposes such as are ordinarily included in the practice of architecture or engineering." This implies that architecture and engineering are only concerned with design of buildings and structures. That statement is not fact. Civil Engineering also includes, but is not limited to, studies, activities and designs in connection with fixed works for irrigation, drainage, water power, water supply, flood control, inland waterways, harbors, all public works improvements, railroads, highways, tunnels, airports and airways, purification of water, sewerage, refuse disposal, soils and soils mechanics, hydraulics, hydrology, foundations, framed and homogeneous structures, and bridges.

If, from the impression given me by other legislators, it is a foregone conclusion this bill will pass regardless of objections, we feel that the definition would be better written as:

"(15)'practice of landscape architecture' means professional service or creative work, and adequate performance of which requires landscape architectural education, training and experience in work of consultation, investigation, research, planning, preparation of drawings and contract documents concerned with the preservation, enhancement or improvement of natural land features with naturalistic and aesthetic values, involved with ground cover and plantings, and determination of environmental problems of land. It does not include work which is defined by statute or usual and common practice of Architecture, Engineering or Land Surveying."

From the information received by us so far, Landscape Architectural Education does not include architecture or engineering of a comprehensive nature to warrant the Landscape Architects being granted the right to practice in the areas of Architecture or Engineering, or to slightly overlap.

Under Section 1 of HB 655, (page 1) the landscape architects are requesting two representatives on the Board of Registration. This is a large representation for an unknown number of people, particularly when they have little history or professional background in Alaska. At a later date with that professional history and background, and sufficient numbers, at least one representative on the board could be a reasonable request. Following is a listing of the present number of each of the present registration categories and their representation on the board.

<u>Catagory</u>	<u>Registrants</u>	<u>Representatives</u>
Civil Engineers	1097	2
*Land Surveyors	588	1
Architects	295	3
Mechanical Engineers	185	1
Electrical Engineers	170	1
Mining Engineers	74	1
Petroleum Engineers	28	0
Chemical Engineers	10	0
*Structural Engineers	3	0
*Sanitary Engineers	1	0

*276 Land Surveyors are dual-licensed Civil and Mining Engineers. The Structural and Sanitary Engineers were licensed in the early 1950's, but these categories are not licensed specifically now.

The purpose for three architects on the Board is that three persons must make the evaluation of architectural applicants. Evaluation of other categories are done the same way - three reviews. The Civil Engineering and Land Surveyor representatives are dual-licensed CE's and L.S.'s.

If the board were increased to eleven, it would be more equitable if one Civil Engineer were returned to the board together with one new category. A petroleum Engineer would be more important, overall, to the State and the public.

The purpose of AS 08.48 is to "safeguard life, health and property, and to promote the general welfare of the public" (ch. 179 SLA 1972). We do not feel that Landscape Architecture addresses the life, health, property and general welfare of the public, other than the aesthetic or artistic values, which are secondary. Aesthetics are not vital to the survival of the public, as are practical and functional works involved in the Architectural or Engineering practice. These latter are Primary.

Section 9 (08.48.196) (page 4) provide the Landscape Architects immediate access to registration in Alaska without examination or fulfilling such requirements such as arctic or permafrost engineering treatise and/or education, which is extremely important to the life, health, and welfare of the public in Alaska. Lines 9 thru 11 (page 4) would allow registration of Landscape Architects with less than the minimum 8 years education and experience, or 16 hours written examination, as required for the design professions.

We do not feel that another level of registration is warranted at this time. If it is in the mind of the Legislature to grant this level of registration, we do not support the concept of allowing the registration at lesser standards than

Representative Terry Gardner
March 16, 1978
Page -4-

are required for the design professionals nor to be allowed by statute to extend their practice into Architectural or Engineering areas for which they do not have competent educational and experience backgrounds.

The Landscape Architects were advised several months ago by the Board of Registration to contact the Architect and Professional Engineering Societies in order to formalize a piece of legislation acceptable to all parties. They chose not to, so now the legislators must wrestle with divergent views from all sides. This certainly wastes a lot of time.

More as an aside from the foregoing, hoping you may be able to answer this for us, we are curious how a group of, purported, 60 Landscape Architects, very few of whom have been in Alaska for three years, appear to have more political backing and support, than the approximately 10,000 voters who are directly involved in the Architectural, Engineering and Land Surveying Professions.

We would appreciate your consideration of our views during your deliberations on this Bill.

Since ely,

ALASKAN SOCIETY OF PROFESSIONAL ENGINEERS



Donald R. Dent, Jr., P.E., L.S.
Legislative Chairman

DRD/sw

HOUSE JUDICIARY

GARDINER 124	Miles	208
Brown 207 A	Rudd	625
Dankworth 203A	Eliason	201A
Carpenter 202A		

SENATE COMMERCE

BRADLEY 207	Sumner	104A
Poland 120	Ray	103
Hackney 105A		

HOUSE STATE AFFAIRS

BRADLEY 123	Nakak	103A
Mckinnon 628	Miles	208
Dankworth 203A	Kelly	211A
Lethin 203A		

LAI 2189 12.09 JADI 0018 12.02 03/07/73

TO SEN COMMERCE COMMITTEE
ATTN: ALL MEMBERS

TO H. STATE AFFAIRS COMMITTEE
ATTN: ALL MEMBERS

TO H. JUDICIARY COMMITTEE
ATTN: ALL MEMBERS

I URGE YOUR SUPPORT FOR HB 655 AND SB 416.

FROM GORDEN SCHLOSSER
3105 W 34 APT 17
ANCH., AK 99503
TELE: 272-2797

EQM
CBK/EOM

W. J. WELLENSTEIN • ARCHITECT • A.I.A., INC.

325 BARROW STREET

ANCHORAGE, ALASKA 99501

PHONE (907) 279-3941 • 277-6254



MARCH 1, 1978

REPRESENTATIVE CLARK GRUENING
POUCH V
JUNEAU, ALASKA 99811

TO CLARK:

RE YOUR LETTER OF FEBRUARY 27, 1978.

PERSONALLY I AM AGAINST THE REGISTRATION OF LANDSCAPE ARCHITECTS.
THEIR PROFESSION HAS NOTHING TO DO WITH THE PROTECTION OF THE PUBLIC
HEALTH, WELFARE OR SAFETY.

IF ANY PROFESSION SHOULD BE LICENSED NEXT IT SHOULD BE THE STRUCTURAL
ENGINEERS.

ADDITIONALLY, THE ARCHITECTS, ENGINEERS AND LAND SURVEYORS BOARD
REGULATIONS ARE PRESENTLY IN THE PROCESS OF BEING REVISED AND
FURTHER LICENSING SHOULD BE DELAYED UNTIL THEY HAVE BEEN APPROVED.

THANKS FOR EXTENDING ME THIS OPPORTUNITY OF EXPRESSING MY VIEWS.

SINCERELY,

A handwritten signature in cursive script, appearing to read "Wally", is written over the typed name.

W. J. WELLENSTEIN
PRESIDENT

WJW/DG

CC: REPRESENTATIVE BRADLEY
REPRESENTATIVE GARDINER

GROUP THREE DESIGN

LANDSCAPE ARCHITECTURE • LAND USE PLANNING • INTERIOR DESIGN

February 28, 1977

Honorable . L. Rader, President
Alaska Senate
Pouch V
Juneau, Alaska 99901

Re.: SB416, Registration for Landscape Architects

Dear Senator Rader:

Thankyou very much for your letter of February 7 and please forgive my delay in answering. Your interest in the bill is very much appreciated.

To bring you up to date, the bill, as originally drafted, is being revised considerably as a result of the February 7th hearing in the Senate Commerce Committee. According to my business partner, Burdett Lent, the questions you raised in your letter were addressed during that hearing.

Regarding the numbers of representatives on the Board, it was generally agreed by all that just one representative would be sufficient for the landscape architects. For further detailed statistics regarding exact numbers of practitioners in the various professions, please permit me to refer you to the chairman of our registration committee, Mr. Ross Hart of the Juneau firm of Kramer, Chin and Mayo. His phone number is Juneau 586-6400.

You asked if landscape architects could be covered under the definition of architects. This was also discussed. The two professions are, in actuality, two separate and distinct fields. Totally different curriculums are required to be properly trained in the practice of each. Presently, existing state examinations in other states test licensure applicants for proficiency in each profession, on a separate basis, because they are different. Please also refer to the definitions for the practice of each in the existing and proposed bills. I think these will help clarify the distinction.

Regarding prohibiting architects from practicing landscape architecture: Again, because these are separate fields, it is fairly unlikely that a practitioner in one would be interested in attempting to practice in the field of another, unless he is trained in both. The general problem of limiting the other professions

Rader
Feb 28, 1978
Page 2

was discussed at the same time. An amendment to the definition, (15), pg.13, was suggested, which no one objected to. In essence that amendment states that there is nothing intended in the definition to restrict or prohibit the other professions in the normal practice in their respective areas.

I do not have the benefit of a copy of the bill as revised by the Commerce Committee. Please refer to that bill as soon as it becomes available as I believe it will address the questions you expressed.

My partner and I hope the above information will be helpful to you. We respectfully request your support.

Yours truly,



Jonathan F. Houk, Partner, ASLA, ASPO
Landscape Architect

cc's. Sen. W. E. Bradley, Chrm., Sen Commerce Comm.
Rep. Bob Bradley, Chrm., House State Affairs Comm.
Rep. Terry Gardiner, Chrm., House Judiciary Comm.
Governor Hammond

STATE OF ALASKA

JAY S. HAMMOND, GOVERNOR

DEPARTMENT OF COMMERCE & ECONOMIC DEVELOPMENT

DIVISION OF OCCUPATIONAL LICENSING

POUCH D - JUNEAU 99811

BOARD OF ARCHITECTS, ENGINEERS AND LAND SURVEYORS

February 28, 1978

Honorable Bob Bradley, Chairman
House State Affairs Committee
Pouch V
Juneau, Alaska 99811

Dear Mr. Chairman:

At the February 25 meeting of the Board of Architects, Engineers and Land Surveyors the bill to license landscape architects was thoroughly reviewed and discussed. A position was taken by the board.

On initial contact by the Landscape Architects Society the board endorsed the basic concept of licensing landscape architects and at the same time the landscape architects were asked to contact other professional societies and keep the board informed. No further contact was made nor information conveyed. The next known to the board was the introduction of HB 739 and SB 416.

The Board of Registration now opposes the bills as presently written. There are three areas of deep concern.

First, it is felt that two members on the board is too great of representation.

Secondly, the board is troubled with the definition of landscape architects. The board sees too great an overlap into other professions such as civil engineering, land surveying and architecture. It further foresees an erosion of the responsibilities of these closely allied professions.

The third area entails the protection of the health, safety and welfare of the public. These are the only reasons for licensing any of our professions and we cannot justify the licensing of landscape architects on these bases.

Honorable Bob Bradley

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February 28, 1978

The board also discussed and showed concern over the number of land surveyors, civil engineers and architects who will be licensed by "grandfather rights" and their subsequent branching into new fields of endeavor through this loophole.

We herewith request your support of drastically revising this legislation or defeating it.

Sincerely,

Douglas Ackley
President

DA/jar2/2

cc: All Senators and Representatives

P.O. Box 2168
Sitka, Alaska 99835

February 28, 1978

Representative Terry Gardiner
Chairman House Judiciary Committee
Pouch V
Juneau, Alaska 99811

Representative Gardiner,
Alaska is one of the few states presently not requiring registration
of Landscape Architects. I urge you to give favorable support of
SB 416 or HB 655 for creating registration of Landscape Architects.

Sincerely,



John Costello

Gardiner



Alaska Society of Professional Engineers

DONALD R. DENT JR. P.E.
National Director
4135 Hood Court
Anchorage, Alaska 99503

Tel. (907) 277-8027
(907) 272-5451

February 17, 1978

Representative Bill Miles
Pouch V
Juneau, AK 99811

Reference: HB 655

Subject: Registration of Landscape Architects

Dear Bill:

I appreciate your calling me Wednesday evening to discuss HB 655.

The Engineering group, mostly in private practice, object to this piece of legislation, and its Senate mirror image SB 416, on the grounds that it will allow an infringement of a non-qualified group of people to practice within areas considered in Alaska and other States as Architecture and Civil Engineering, as well as leaving the door open for infringements on platting and planning processes at the local level which effect Land Surveying.

I am attaching excerpts from AS08.48.341 and 12AAC36.250 which will give you Statutory and Administrative background that we are looking at.

In the proposed HB 655, under Section 30 "Practice of Landscape Architecture", the definition is vague enough that functions which are part of the practice of Architecture, Engineering and Surveying could be infringed with impunity as is stated on line 8, "...but not limited to..." Specific infringements lines 8 thru 11, "... consultation, investigation, research, planning, design, preparation of drawings, specifications and contract documents and responsible supervision or construction management in connection with the development of land;" note semi-colon at end of this sentence. At first reading it appears that next sentence "to the extent," etc. is part of the aforementioned but it is not. Lines 8 thru 13 is carte blanche license to do any or all A-E or L.S. work involved in land development.

Lines 12 thru 22 just name specifics which are infringements also.

- Line 13 - "... or improvement of natural land features,..." A-E functions.
Line 14 - "... naturalistic or aesthetic values, or determination of proper land use..." A-E and L.S. Functions.
Line 16 - "...approaches for buildings and structures or other improvements..." involves paving, parking, traffic pattern, sight distances, screening-to name a few.
Line 17 thru 20 - without quoting, this is a clear statement of supposed ability of landscape architects to do hydraulic and hydrologic engineering, as well as, site engineering.
Line 22 thru 24 - stating that it does not include "design of buildings or structures with separate and self-contained purposes such as are ordinarily included in the practice of architecture or engineering" does not conform with the previous statements or fact, in that it says architecture and engineering are only concerned with design of buildings and structures.

If, from the impression you left with me, it is a foregone conclusion the bill will pass regardless of objections, this definition would be better written as:

(15) "practice of landscape architecture" means professional or creative work, the adequate performance of which requires landscape architectural education, training and experience in work of consultation, investigation, research, planning, design, preparation of drawings and contract documents concerned with the preservation, enhancement or improvement of natural land features with naturalistic and aesthetic values, involved with ground cover and plantings, and determination of environmental problems of land. It does not include work which is defined by statute or usual and common practice of Architecture, Engineering or Land Surveying.

Under Section 1 of HB 655, the landscape architects are requesting two representatives on the Board of Registration. This is a large representation for a small number of people. Following is a listing of the present number of each categories and their representation on the board:

<u>Category</u>	<u>Registrants</u>	<u>Representatives</u>
Civil Engineers	1097	2
*Land Surveyors	588	1
Architects	295	3
Mechanical Engineers	185	1
Electrical Engineers	170	1
Mining Engineers	74	1
Petroleum Engineers	28	0
Chemical Engineers	10	0
*Structural Engineers	3	0
*Sanitary Engineers	1	0

Representative Bill Miles
February 17, 1978
Page -3-

*276 Land Surveyors are dual-licensed Civil and Mining Engineers. The Structural and Sanitary Engineers were licensed in the early 1950's, the categories are not licensed specifically now.

The reason for three architects on the Board is that three men make the evaluation of architectural applicants. Evaluation of other categories are done the same way - three reviews. The Civil Engineering and Land Surveyors are dual-licensed CE's and L.S.'s.

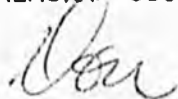
If the board were increased to eleven, it would be more equitable if one Civil Engineer were returned to the board together with one new category. A Petroleum Engineer would be more important, overall.

If, as indicated by you, that the bill will go through anyway, we would like to see AS 08.48.261 (see Section 20) and AS 08.48.331(12) (see Section 28) repealed. They are both sections leading to enforcement ambiguities. A former Highway Commissioner and Public Works Commissioner had 261 inserted in the law in 1972 purportedly to assist them in administration of their departments. Since then it has been ignored by those departments and they have had non-qualified, non-registered people making engineering decisions which definitely affect the public health and welfare - Juneau "freeway" falling apart is an example. 331(12) allows firms to do Architectural, Engineering or Land Surveying work without a license although affecting public life, health, and welfare. This paragraph was inserted by Al McVeigh on floor vote in 1972.

Bill, I think you get the picture of how we view the registering of Landscape Architects. We would like to see both bills (HB 655 and SB 416) kept in committee to die with the session. To require another level of registration we feel is unwarranted in this case.

Sincerely,

ALASKAN SOCIETY OF PROFESSIONAL ENGINEERS



Donald R. Dent, Jr., P.E., L.S.
Legislative Chairman

association or corporation which officer or employee practices architecture, engineering or land surveying when required by his official capacity or work duties connected with his employment if such individual firm, partnership, association or corporation is not engaged in the business of offering architectural, engineering or land surveying services to the public.

Sec. 08.48.341. DEFINITIONS. In this chapter

- (1) "architect" means a professional architect;
- (2) "board" means the State Board of Registration for Architects, Engineers and Land Surveyors;
- (3) "certificate of authorization" means a certificate issued by the board authorizing a corporation to provide professional services in architecture, engineering or land surveying through individuals legally registered by the board;
- (4) "certificate of registration" means a certificate issued by the board recognizing the individual named in the certificate as meeting the requirements for registration under this chapter;
- (5) "engineer" means a professional engineer;
- (6) "land surveyor" means a professional land surveyor;
- (7) "practice of architecture" means professional service or creative work in the functional and aesthetic design of structures, the teaching of advanced architectural courses in institutions of higher learning, consultation, investigation, evaluation, planning, design and professional observation of construction of public or private structures buildings, works or projects, and architectural review of plans and specifications by regulatory agencies; it may by regulation of the board include mechanical, electrical or structural design of relatively minor importance to the project as a whole;
- (8) "practice of engineering" means professional or creative work, the adequate performance of which requires the application of specialized knowledge of mathematics and sciences, dealing with the functional and economic design of buildings, structures, machines, equipment, utilities systems, materials, processes, works or projects, public or private; the teaching of advanced engineering courses in institutions of higher learning, the direction of or the performance of engineering surveys, consultation, investigation, evaluation, planning, design, and professional observation of construction of public and private structures, buildings, works or projects and engineering review of plans and specifications by regulatory agencies; it may by regulation of the board include architectural design of relatively minor importance to the project as a whole, but it does not include comprehensive architectural services;
- (9) "practice of land surveying" means any service or work the adequate performance of which involves the application of special knowledge of the principles of mathematics, the related sciences, and the relevant requirements of law for adequate evidence of the act of measuring and locating land, geodetic and cadastral surveys for the location and monumentation of property boundaries, for the platting and planning of land and subdivisions, and for the preparation and perpetuation of maps, record plats, field note records and property descriptions that represent these surveys;
- (10) "professional architect" means a person who has been legally registered as a professional architect by the board;
- (11) "professional engineer" means a person who has been legally registered as a professional engineer by the board;
- (12) "professional land surveyor" means a person who has been legally registered as a professional land surveyor by the board;
- (13) "responsible charge" means the direct control and personal supervision of work.

PROFESSIONAL AND VOCATIONAL REGULATIONS

(4) "civil engineering" means that branch of professional engineering which embraces studies and activities in connection with fixed works for irrigation, drainage, waterpower, water supply, flood control, inland waterways, harbor, municipal improvements, railroads, highways, tunnels, airports and airways, purification of water, sewage, refuse disposal, foundations, framed and homogeneous structures, buildings or bridges;

(5) "design" means the original and unique application of basic aesthetic, mathematical and physical and chemical principles to provide an acceptable solution of a problem or project;

(6) "direct personal supervision" means direct personal supervision at the working level of the preparation of architectural or engineering documents affecting the health, welfare and safety of the public and not as indirect supervision from a higher level of management;

(7) "ECPD" means Engineering Council for Professional Development;

(8) "electrical engineering" means that branch of professional engineering which embraces studies and activities relating to generation, transmission and utilization of electrical energy and to telecommunications systems and facilities, including the design of electrical, electronic and magnetic circuits and components, and the technical control of their operation and of the design of electrical and telecommunications gear; it is concerned with the research, organizational and economic aspects of these studies and activities;

(9) "mechanical engineering" means that branch of professional engineering which deals with engineering problems relating to generation, transmission and utilization of energy in the thermal or mechanical form, and also with engineering problems relating to the production of tools, machinery and their products and to mechanical processes, heating, air conditioning, refrigeration and plumbing; it is concerned with the research, design, production, operational, organizational and economic aspects of these studies and activities;

(10) "mining engineering" means that branch of professional engineering which embraces studies or activities relating to the exploration, location, exploitation and recovery of minerals and mineral ores; it is concerned with research, design, construction and development of structures, devices and facilities of production and the economic aspects related to these studies and activities;

(11) "NAAB" means the National Architectural Accrediting Board;

(12) "NCARB" means the National Council of Architectural Registration Boards;

(13) "NCEE" means the National Council of Engineering Examiners;

(14) "petroleum engineering" means that branch of professional engineering which embraces studies or activities relating to the exploration, location, exploitation and recovery of natural fluid hydrocarbons; it is concerned with research, design, production and operations of devices, and the economic aspects of these studies and activities;

(15) "practice of architecture" includes mechanical, electrical, or structural design of relatively minor importance to the project as a whole;

(16) "practice of engineering" includes architectural design of relatively minor importance to the project as a whole;

(17) "professional engineering" includes:

(A) chemical engineering;

(B) civil engineering;

PROFESSIONAL AND VOCATIONAL REGULATIONS

(C) electrical engineering;

(D) mechanical engineering;

(E) mining engineering;

(F) petroleum engineering;

(18) "professional work" means the time the applicant has been occupied in architecture, engineering or land surveying work of higher grade and responsibility than that of sub-professional work;

(19) "responsible charge of work in the field" means the direction of work, the successful accomplishment of which rested upon the applicant, where the applicant has to decide questions of methods of execution and suitability of materials without relying upon advice or instructions from his superiors and where the applicant has to supply solutions to deficiencies in plans or has to correct errors in designs without first referring them to higher authority for approval, except where the approval is a matter of form;

(20) "responsible charge of work in the office" means undertaking investigations or carrying out assignments, which demand resourcefulness and originality, or making plans, writing specifications, and directing drafting and computations for the design of architectural, engineering or land surveying work with only rough sketches, general information and field measurements for reference;

(21) "state" means the State of Alaska;

(22) "sub-professional work" means time spent working as rodman, chainman, recorder, draftsman, clerk of works, instrument man, inspector, or similar work where personal responsibility and technical knowledge are slight. (Eff. May 23, 1974, Register 50)

Authority: AS 08.48.101

BRUCE G. SHARKY, ASLA
3129 Lochwood Circle
Anchorage, AK 99504
(907) 337-6932

January 30, 1978

The Honorable Representative Gardiner, Chairman
House Judiciary Committee
Pouch V
Juneau, Alaska

RE: House Bill NO. 655
Landscape Architects

Honorable Representative Gardiner:

The purpose of this letter is to convey my support of Bill NO. 655 . Passage of the Bill would be in the public interest and I therefore urge you to give support to the Bill.

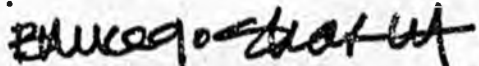
The profession of landscape architecture is a recognized and established profession of long standing. Its origins are from Europe where it flourished prior to the American Revolution. The first landscape architect in the United States was Fredrick Law Olmstead, the designer of New York City's famous Central Park. Presently there are some 35 states having laws providing registration for landscape architects. 21 universities have four year programs leading to a bachelors degree; 15 schools offer advanced degrees. The designated accrediting body for these schools is the American Society of Landscape Architects (founded in 1899). The Council of Landscape Architects Registration Board administers the Unified National Examination, an examination recognized and validated by HEW.

I have read over the Bill and feel that it will provide valuable protection to the public's health, safety and welfare in the specific areas of service members of the landscape architecture profession are dully qualified and technically trained. Further I believe the lack of registration in Alaska unfairly restricts landscape architects from practicing their profession.

The concept of incorporating registration of landscape architects into the existing Architects, Engineers and Land Surveyors' statute is particularly meritorious from the standpoint of being a sound fiscal measure as well as a practical and efficient administrative framework.

It is my sincere belief that the passage of the Bill would be in the public interest and would allow landscape architects in our State to contribute towards the enhancement of our living and economic environment. I therefore urge you to support the Bill and give it the necessary guidance as it is reviewed in committee and on the floor. Thank you for your support.

Very sincerely,


Bruce G. Sharky, ASLA

February 21, 1978

Honorable Terry Gardiner
State House Judiciary Comm.
Juneau, Alaska 99811

Dear Mr. Gardiner;

House Bill No. 655 requiring the licensing of Landscape Architects is, in my opinion, not in the best interest of the people of the State of Alaska.

The duties set forth in Section No. 30 of the proposed bill which "protect the public health, safety, and welfare" are clearly a duplication of duties for licensed professionals already in existence.

Landscape Architecture is a specialized branch of one or more of the existing professions and not so independent to warrant its own license.

This bill, if passed, would allow the duties of a Landscape Architect to unduly overlap those of a professional Civil Engineer or Architect.

Therefore, I would strongly urge House Bill No. 655 be defeated.

Sincerely;



Terry Brenner

Rt. 4, Box 4545-25
Juneau, Alaska, 99803

February 15, 1978

The Honorable Mike Miller
House of Representatives
Pouch V
Juneau, Alaska 99811

Re: House Bill 655
An Act Relating to the State Board
of Registration for Architects,
Engineers and Land Surveyors

Dear Sir,

As a Registered Professional Engineer (1855-E, 1969) and a Registered Land Surveyor (1410-S, 1965), both by examination in the State of Alaska, I wish to submit my strongest objections to your House Bill No. 655 concerning legislation of the State of Alaska for the recreation of our existing State Board of Registration for Architects, Engineers, and Land Surveyors into a State Board of Registration for Architects, Engineers, Landscape Architects, and Land Surveyors.

The primary concern of those desiring the expansion of the present existing board of Architects, Engineer and Land Surveyors is their immediate need for professional licensing. Those landscape architects desiring professional licensing state their primary reasons are;

- 1). to protect the public health, safety and welfare
- 2). lack of registration in Alaska restricts landscape architects from practicing their profession.

To both of their primary concerns I state that this is a falsism. In reviewing Concern No. 1 and utilizing such reference texts as McGraw-Hills Dictionary of Scientific and Technical Terms, the following definitions are given for Landscape Architecture and Landscape Engineer.

Landscape Architecture: The art of arranging and fitting land for human use and enjoyment.

Landscape Engineer: A person who applied engineering principals and methods to planning, design and construction of natural scenery arrangements on a tract of land. (It is interesting to note that there is not a definition for a Landscape Architect in any of the reference texts I examined.)

The Honorable Mike Miller
House of Representatives
February 15, 1978
Page 2

I find it hard to believe that the principle methods of planning and designing for the construction of natural scenery arrangements (the cosmetics of land) concerns the health, safety and welfare of the public. The other point, the lack of registration restricts landscape architects from practicing their profession is also a falsism. There are landscape architects practicing not only in established architectural/engineering firms but also those practicing on their own without any enfringement onto the regulations and laws governing the practice of architects, engineer and land surveyors.

Landscape architecture, or landscape engineering, whichever the definition desired to utilize, is in truth, a subfield of architecture and engineering. Presently, the state of Alaska does not registered subfield professionals. There have been many cases in point where subfields have desired or tried to change registration acts. I specifically cite legislation years past to register specifically highway engineers, sanitary engineers, and structural engineers. It was felt then, that all these professions are subfields of the prime professional engineer and being a professional, it is the individual's integrity and knowledge that will keep the professional from working in a field that he may not have a complete and knowledgable understanding therein. Therefore, it is this writer's primary opinion that if a Landscape Architect desires registration and he or she has attended and graduated from a school of architecture or engineering, he or she can take the registration examination for an architect or engineer and practice in his or her chosen field of endeavor, i.e., Landscape Architecture.

I have objections, both as an engineer and as a land surveyor, to Page 13 of the bill, Section 30 AS 08.48.341, Item (15), "Practice of Landscape Architecture". This defines the practice of landscape architecture as "professional service or creative work, the adequate performance of which requires landscape architectural education, training and experience, professional services include, but are not limited to, consultation, investigation, research, planning, design, preparation of drawings, specifications, and contract documents and responsible supervision or construction management in connection with the development of land areas". To the above, this is allowed through the present board regulations in the field of not only architecture but also engineering and land surveying to a limited extent. Specific items within the Landscape Architect's Architecture's realm of responsibility include;

"the determination of environmental problems with land relating to erosion, flooding, blight, and other hazards".

The Honorable Mike Miller
House of Representatives
February 15, 1978
Page 3

This is the primary field of civil engineering with a specialty of soils engineering, hydrology engineering and geophysical engineering and to imply that the surficial "cosmetic" treatment of land extends into the previous fields is incorrect. Alaska is unique in its soil problems. Our northern regions are sublined with tundra and permafrost while our southern regions are covered and sublined with peat (muskeg) and glacial marine drifts and tills. There is no school of architecture, to my knowledge, that has specialized education in the treatment of soils with such unique difficulties. The University of Alaska does not have a school of architecture and I do not believe training to deal with soils and other hazards can be obtained anywhere else in the United States with Alaska's particular problem, save and except through the University of Alaska or through practical experience gained while working for and under other professional individuals.

"The shaping and contouring of land and water forms".

This is already conducted by existing practicing architects, engineers and land surveyors. Either these individuals desiring to perform such service can be registered in the prime professional field or all existing architects, engineers, and land surveyors should be Grandfather'ed into becoming Landscape Architects.

"the determination of drainage and provisions of storm drainage systems where those systems do not require structural design of system components".

Storm drainage design, rainfall runoff, etc. is conducted usually by civil engineers and to some limited extent, by architects and land surveyors. The design of system components for storm drainage systems is the detailed and unique field which involves soils analysis, structural competence, etc. This statement and others reflect that Landscape Architects have special education and training in hydraulic and hydrology which I personally do not believe is factual. If it were, or is, why do they not take the current professional examinations?

It must be stated that there seems to be extensive overlaps between landscape architecture, architecture, engineering, and land surveying. It is my opinion that Alaska does not need any new registered specialists in any field. The recognition of them (landscape architects) and allowing landscape architects to become active members of our board should be based on their ability to pass existing examinations in the current fields of architecture or engineering to denote their competence to practice professionally. Other professional individuals are presently allowed to practice without registration and I believe this bill

The Honorable Mike Miller
House of Representatives
February 15, 1978
Page 4

would bring them forward in mass, to desire professional "public" recognition. These other professionals include; biologists, hydrologists, geologists, geophysicists, as well as others. The bill could only cost the State confusion in responsibility, many added dollars to the already far extended budget to police and monitor such a program, as well as render examinations in this particular field.

Further objections I have to the bill concern the enlargement of the board. Presently the board consists of nine members with a quorum being five. This bill expands the board to 11 members with six members being a quorum. The quorum should never be made up of a possible tie vote. It is my understanding from talking with board members, that the budget for such a board is relatively limited. The board does not have sufficient funds to act or police much of the existing regulation, let alone creating more expense to the State by adding landscape architects to the board (two each) and allowing them such a large vote on said board.

In closing I must reiterate strongly that the need for specialities added to the existing Board of Architects, Engineers and Land Surveyors is not required to register professionally those individuals desiring specialized registration. Registration can be obtained by the general examination and specifically the lack of landscape architects registered in Alaska, has not, to date, restricted them from practicing their profession in Alaska.

Should there be questions or if I may be of further assistance in explaining my views on this act of legislation, I would be most happy to do so at your convenience.

Sincerely,



Malcolm A. Menzies
Civil Engineer: 1855-E
Land Surveyor: 1410-S

MAM:fej

P.O. Box 1786
Juneau, Alaska 99802



engineers
planners
economists
scientists

7 February 1978
K40.10

Honorable W.E. "Brad" Bradley, Chairman
Senate Commerce Committee
Pouch V
Juneau, Alaska 99811

Dear Senator Bradley:

Subject: Proposed Registration of Landscape Architects,
SB 416

I am a registered civil engineer with extensive personal experience in projects which required a strong involvement by landscape architects. While most of these projects were accomplished beyond Alaska, it was apparent that the most effective professionals resided in growing communities.

The impact these talented people has on many routine and prestigious projects was invaluable.

I strongly support professional registration of these specialists. They provide services beyond those technical areas commonly practiced by architects or engineers and will be a significant force in Alaska's future growth.

It is critical, however, that the wording of the registration law not prevent the continued execution of specialized areas such as site design or the various areas of planning which are competently accomplished by many architects, engineers or planners.

Sincerely,

A handwritten signature in a circular scribble, appearing to be 'Torkko'.

Charles E. Torkko
Regional Manager

CET:hs

→ cc: Terry Gardiner - Alaska Senate
Bob Bradley - Alaska Senate

6234 Tanaina Drive
Anchorage, Alaska 99502
February 8, 1978

Representative Terry Gardiner
Chairman, House Judiciary Committee
Pouch V
Juneau, Alaska 99801

Dear Mr. Gardiner:

Your Committee has before it, House Bill 655 regarding the licensing of Landscape Architects.

While I am unfamiliar with the contents of the bill, I am aware of the problem Landscape Architects face in regard to drawing plans for projects with Federal funding. It is required that such plans be stamped by a licensed firm. While architects and engineers in Alaska are so licensed, Landscape Architects are not. This is a severe handicap.

I can appreciate that endless licensing of professions may not be the answer but some solution must be found to the above stated problem.

Sincerely,

Gwynneth Wilson, Chairman
Resolution Park Steering Committee

1771 Wakefield Circle
Anchorage, Alaska 99502
February 3, 1978

The Honorable Terry Gardiner
Alaska State House of Representatives
Pouch V, State Capitol Building
Juneau, Alaska 99811

Dear Mr. Gardiner:

I urge you to support HB 655 to ensure the professional registry and licensing of landscape architects in Alaska.

At present, lack of recognition by the State severely restricts and discourages landscape architects from economically feasible private practice. I am aware of several instances in which landscape architects have been denied rightful opportunities, and damaged economically from representing their clients in getting designs, construction drawings and technical documents approved because they are not recognized by State registry. This affects not only those currently practicing in Alaska, but also discourages young professionals from moving into the state.

Registry would also prevent the hiring of unqualified persons in land planning projects which directly involve issues of public concern, health, safety or welfare.

Landscape architects' entire training and ethics are directed toward responsible and comprehensive planning and design of land and outdoor spaces; from a state or region-wide scale, down to individual residences. Their profession works in concert with, not in conflict with, architects, engineers, and land surveyors.

Please support HB 655.

Hetty Mitchell

Hetty Mitchell
Landscape Architect

*where do you
stand on this*

By Miller - in H-St Affairs / Judiciary / Rules

LAND
DESIGN
NORTH

LANDSCAPE ARCHITECTURE
RESOURCE/RECREATION PLANNING
1709 S BRAGAW ST., SUITE J
ANCHORAGE, ALASKA 99504
(907) 277-7122

February 3, 1978

The honorable Representative Gardiner, Chairman
House Judiciary Committee
Pouch V
Juneau, Alaska 99801

Honorable Representative Gardiner

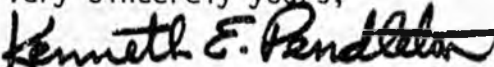
As a landscape architect in private practice I am writing to urge your support for passage of House Bill 655, establishing professional licensing for landscape architects practicing in Alaska.

I have practiced in Alaska for over three (3) years without the benefit of licensure; and believe that passage of this legislation is in the public's interest as it relates to the health, safety, and welfare of users of completed landscape architectural projects.

In preparation for becoming a landscape architect I completed six (6) years of educational training at the University of California, worked for local government in the field of park planning and construction and passed and been licensed to practice landscape architecture in the State of California. Since moving and starting my practice here in 1975 I have found incompetence, misinformation, and potentially hazardous works being completed by untrained specialists.

It is my sincere belief that passage of this legislation will contribute towards the betterment of our living environment, and economic growth of this State. I hope you will support the Bill and give it guidance as it is reviewed through committee and on the floor.

Very sincerely yours,



Kenneth E. Pendleton, ASLA
Principal

KEP:cc

January 27, 1978

Honorable Representative Terry Gardiner
House Judiciary Committee Chairman
Pouch V
Juneau, AK 99811

Re: House Bill No. 655

Honorable Representative Gardiner:

The purpose of this letter is to convey my support of the above Bill. Passage of the Bill would be in the public interest and I therefore urge that you support the Bill.

I have read over the Bill and feel that it will provide valuable protection to the public's health, safety and welfare in the specific areas of service in which members of the landscape architecture profession are duly qualified and technically trained. I believe the lack of registration in Alaska restricts landscape architects from practicing their profession.

The concept of incorporating registration of landscape architects into the existing Architects, Engineers and Land Surveyors' statute is particularly advantageous from the standpoint of being both a sound fiscal measure and efficient administrative concept.

Again I urge you to support the Bill and give it the necessary guidance in order to pass this legislative session.

Very truly yours,



Stephen Fiskum
Registered Architect No. 12428, Minnesota

SF:ds

R. D. MASSEY & ASSOCIATES

▫ AIA

January 30, 1978

Terry Gardiner, Chairman
House Judiciary Committee
Pouch V
Juneau, Alaska 99811

RE: House Bill no. 655

Honorable Representative Gardiner;

The purpose of this letter is to express concern and reservation regarding the above bill. My concern is two-fold.

First, the proposed section 30 which would amend by adding a new paragraph defining "practice of landscape architecture" to AS 08.48.(341). Most of the defined areas are now performed by capable architects, engineers, land surveyors and planners (not a registered profession), often in conjunction with landscape architects. In actual practice, I feel that this definition legally removes from me specialties that I feel I must perform or control in order to fulfill my responsibilities as a professional architect. The passage of this bill will require me to retain the services of a consulting landscape architect for all building for which I am commissioned. I feel that this is unreasonable and will further inflate the total consultants' fee for buildings and structures by requiring another consultant to perform work traditionally done by other registered professionals.

Secondly, the registration statutes are primarily concerned with professions directly involved with public health, safety, and welfare. I do not feel that professional registration for landscape architects is warranted under the intended protection of the public. The extent of their work is not of a nature similar to others covered by this statute, i.e., design of habitable structures, sanitary systems or legal plotting.

At the January meeting of the Anchorage Chapter, American Institute of Architects, representatives of the American Society of Landscape Architects stated that the reasoning behind the bill was to guarantee that one would be able to distinguish qualified landscape architects. This, however, could be achieved by other means.

If this bill should be enacted, I feel that the Grandfather Clause is over restrictive. I am sure others who now are engaged in other types of practice, but do work in areas of specialties described

cont. . . .

**Architects
& Planners**

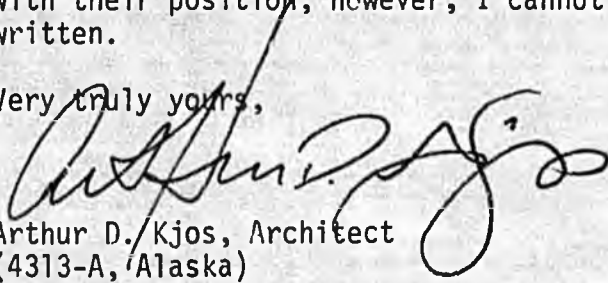
1503 West 33rd (907) 276-0929
Anchorage, Alaska 99503

in the bill in execution of their present duties, would feel this way also. As a professional architect and as a planner with four and one-half (4½) years of practice, I feel that I would unduly be deprived of my right to provide services to the public under the restrictions of this bill. I am already, as an individual and as chief architect of a firm, providing these consulting services. Passage of this bill would place undo hardship on myself and others in similar positions.

Amendment of section 08.48.011 to require two board members to be landscape architects would be out of proportion of work load. If representation is required, one member would be adequate.

In closing, I would like to state that I can somewhat sympathize with their position, however, I cannot support this bill as it is written.

Very truly yours,



Arthur D. Kjos, Architect
(4313-A, Alaska)
Chief Architect
R.D. MASSEY & ASSOCIATES

ADK:rjc

cc; Governor Jay S. Hammond
Representative C.U. Chatterton
Representative Rick Urion
Senator Joseph Orsini
Representative Bob Bradley
Senator W.E. Bradley

January 27, 1978

Honorable Representative Terry Gardiner
House Judiciary Committee Chairman
Pouch V
Juneau, AK 99811

Re: House Bill No. 655

Honorable Representative Gardiner:

The purpose of this letter is to convey my support of the above Bill. Passage of the Bill would be in the public interest and I therefore urge that you support the Bill.

I have read over the Bill and feel that it will provide valuable protection to the public's health, safety and welfare in the specific areas of service in which members of the landscape architecture profession are duly qualified and technically trained. I believe the lack of registration in Alaska restricts landscape architects from practicing their profession.

The concept of incorporating registration of landscape architects into the existing Architects, Engineers and Land Surveyors' statute is particularly advantageous from the standpoint of being both a sound fiscal measure and efficient administrative concept.

Again I urge you to support the Bill and give it the necessary guidance in order to pass this legislative session.

Very truly yours,



Stephen Fiskum
Registered Architect No. 12428, Minnesota

SF:ds

STATE OF ALASKA

JAY S. HAMMOND, GOVERNOR

DEPARTMENT OF COMMERCE &
ECONOMIC DEVELOPMENT

DIVISION OF OCCUPATIONAL LICENSING / POUCH D - BUREAU 2211

BOARD OF ARCHITECTS, ENGINEERS & LAND SURVEYORS

October 31, 1977

Mr. Bruce G. Sharky, President
Alaska Chapter of
American Society of
Landscape Architects
3129 Lochwood Circle
Anchorage, AK 99504

Dear Mr. Sharky:

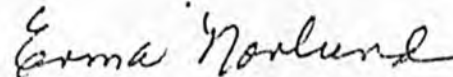
The Board of Architects, Engineers & Land Surveyors wishes to thank you and the other members of your organization for your presentation at their September meeting.

They wish you to know that they support the basic concept of registration for landscape architects. However, they feel it is advisable to enlist the input and support of the various societies you would be working with.

They would appreciate being updated periodically on your progress.

If they can be of assistance please do not hesitate to contact this office.

Very truly yours



Erma Norlund
Licensing Examiner

EN/1s/1/31

LANDSCAPE ARCHITECTS CURRENTLY WORKING
IN THE STATE OF ALASKA

	NAME	EMPLOYMENT	CITY
1.	Wayne Adams	U.S. Air Force	Elmendorf
2.	R. Clay Allred	Retired	Juneau
3.	Sonja Alavarez	Private Practice	Ketchikan
4.	Rainer E. Behnert	U.S. Forest Service	Juneau
5.	Ed Brannon	U.S. Forest Service	Juneau
6.	Bailey Breedlove	National Park Service	Anchorage
7.	Douglas Campbell	U.S. Forest Service	Ketchikan
8.	Eric Chan	Chan & Chan	Anchorage
9.	Sandra Cook	Bomhoff Associates	Anchorage
10.	John Costello	U.S. Forest Service	Sitka
11.	Wilber B. Creighton	Fairbanks N.Star Bor.Div.Pks.	Fairbanks
12.	Ron Allen Crenshaw	Alaska State Parks	Anchorage
13.	Jeff Drage	Quadra Engineers	Anchorage
14.	Sherl Eastburg	Student (U of O)	Anchorage
15.	Richard Estelle	U.S. Forest Service	Petersburg
16.	W. L. "Bill" Evans II	Private	Anchorage
17.	Paul Fritz	National Park Service	Anchorage
18.	David H. Gardner	R&M Consultants, Inc.	Anchorage
19.	John A. Gliva	Alaska Dept. Comm. Reg. Affs.	Anchorage
20.	Ross F. Hart	Kramer, Chin & Mayo, Inc.	Juneau
21.	Ed Hartsell	U.S. Forest Service	Ketchikan
22.	Ward Hastings	B.L.M. OCS Office	Anchorage
23.	Steve Henig	U.S. Forest Service	Anchorage
24.	Glen Hildreth	Sitnasuak Native Corp.	Nome
25.	Wayne (Bud) Hooker	Alyeska Pipeline Service Co.	Anchorage
26.	Jonathon F. Houk	Group III Design	Anchorage
27.	Cindy Kinard	U.S. Corps of Engineers	Anchorage
28.	Jim Kirshenman	U.S. Forest Service	Ketchikan
29.	James Knode	U.S. Forest Service	Sitka
30.	Richard A LeFebvre	Alaska Division of Lands	Anchorage
31.	Burdett B. Lent	Group III Design	Anchorage
32.	Carlos Lozano	U.S. Forest Service	Anchorage
33.	Duane H. Lyon	U.S. Forest Service	Anchorage
34.	Rod Monroe	Unalakleet Native Corp.	Unalakleet
35.	Hetty Mitchell	Anchorage Park Department	Anchorage
36.	Dolores Moulton	Alaska Dept. of Fish and Game	Juneau
37.	Kenneth E. Pendleton	Land Design North	Anchorage
38.	Louis C. Penna	Anchorage Park Department	Anchorage
39.	Guy Pugmire	U.S. Corps of Engineers	Anchorage
40.	Sanford P. Rabinowitch	Alaska Division of Parks	Anchorage
41.	Carl Richter	U.S. Forest Service	Petersburg
42.	David C. Riemer	U.S. Forest Service	Petersburg
43.	Stan Rogers	B.L.M. Alaska Pipeline Ofc.	Anchorage
44.	Frank Rue	Alaska Dept. Comm.Reg.Affs.	Juneau
45.	Gordon J. Schlosser	Private Practice	Anchorage
46.	Benjamin Shaine	Private Practice	Anchorage
47.	Bruce G. Sharky	Land Design North	Anchorage
48.	Nola Sharky	Land Design North	Anchorage
49.	Harry Shore	Tryck, Nyman & Hayes	Anchorage
50.	John Short	U.S. Forest Service	Ketchikan
51.	Stanley V. Specht	Bureau of Land Management	Anchorage
52.	Marcia A. Steven	Group III Design	Anchorage

53.	Helen P. Sullivan	Private Practice	Anchorage
54.	Vicki Sung	Chan & Chan	Anchorage
55.	Jim Tallerico	U.S. Forest Service	Anchorage
56.	Darrel Tracy	U.S. Forest Service	Sitka
57.	Ronald L. Wood	U.S. Forest Service	Juneau
58.	Lee A Wyatt	R&M Consultants	Anchorage

SOME PRACTICAL QUESTIONS RELATING TO LICENSURE OF LANDSCAPE ARCHITECTS

TO: THE LEGISLATURE OF THE STATE OF ALASKA
TENTH LEGISLATURE - SECOND SESSION

RE: SENATE BILL NO. 416
HOUSE BILL NO. 655

PREPARED BY: ALASKA CHAPTER, AMERICAN SOCIETY OF LANDSCAPE
ARCHITECTS - CONTACT: MR. ROSS HART - 586-6400

SOME PRACTICAL QUESTIONS

1. WHY IS LICENSURE NEEDED?

Grounded in the responsibility of the State of Alaska to maintain means for protecting health, safety, and welfare of their citizens, licensure provides a basis for making a determination of minimum competency. When that determination has been made, the state may then confer the privilege of doing some thing(s) or engaging in certain practices as indicated on a license issued to the person proven competent. The most widely known is the driver's license issued upon an individual's passing a driving test.

In essence, a license holder has been granted permission to do something that, if done improperly, could harm others. Such permission must be granted by a duly established authority in order to protect the public, assure competence, weed out incompetence, and to provide discipline, redress, or revocation where bad practice has been proven. Moreover, since an average client cannot be reasonably expected to have the level of sophistication necessary to adequately evaluate either the specialized services offered by Landscape Architects or the level of competence of a given practitioner, that client needs the specialized protections provided by licensure. In addition, since certain elements of specialized practice may already have been legally sanctioned as being under the purview of other more established professions whose requirements to sit for examination may prohibit members of younger professions from qualifying, due process must be available to applicants whose newer area of expertise is not provided for by the older boards or the examinations they administer.

2. HOW IS LANDSCAPE ARCHITECTURE INVOLVED WITH HEALTH, SAFETY, AND WELFARE?

"Clear and direct" relationships between protection of the public and the practice of Landscape Architecture may be seen in the following examples:

- a. Improperly specified relationships between water supplies, such as to artificial ponds, fountains, etc., and water drainage facilities could result in contamination of a water supply system of an entire community.
- b. Improper design of outdoor lighting systems and their supply lines could present undue fire and/or shock hazards.
- c. Inadequate design of outdoor structures such as those used in parks and other recreational facilities could result in injury should those structures fail. Such structures can include small shelters, footbridges, gazebos, kiosks, decks, rest facilities, among others.
- d. Specification of unsafe playground equipment could result in injury and consequent liabilities.

- f. Inadequate provision for drainage can result in flooding of foundations, basements, walkways, highway rights of way, recreation areas, and other kinds of facilities used by the public. This could present particularly serious hazards under the freezing conditions of Alaska.
- g. Lack of adequate knowledge of plant materials and their functional characteristics and interrelationships with various kinds of soils and other environmental elements can present at least these kinds of hazards:
 - i. trees placed in soils whose structural characteristics do not provide its root system adequate physical support under stress of certain wind conditions.
 - ii. root systems placed too near foundations of structures will ultimately weaken the structure.
 - iii. certain toxic or otherwise harmful species could harm children in a variety of ways.
 - iv. specification of hardwood trees on highway medians or otherwise too close to rights-of-way present a serious hazard to motorists and their passengers.
 - v. specification of plant materials on incompatible soils can result in deadwood that provides fire hazards.
- h. Improper specifications for grading and filling can result in soil slippage and washing or even massive erosion.

3. HOW HAVE LANDSCAPE ARCHITECTS BEEN PREVENTED FROM PRACTICING UNDER PRESENT LAW?

Restraint from practice has occurred:

- a. under those conditions when Landscape Architects may not even submit a bid for contract because some portion of work they are trained to do has been allocated jurisdictionally to the purview of regulatory boards of related environmental design professions.
- b. under those conditions where a call for bids specifies or falls under more general policy provisions of given private and public agencies requiring that the bidder hold a valid license as proof of minimum competency.

Existence of either or both of the two conditions given above not only by themselves may constitute a restraint of trade impediment within given jurisdictions but also becomes a particularly severe restraint on Landscape Architects seeking out of state work while their home state provides no licensure through which they may present a legally sanctioned proof of competence.

4. DON'T LANDSCAPE ARCHITECTS JUST WANT LICENSURE AS A STATUS SYMBOL?

Landscape Architects want licensure in order that the profession will not be marred by the adverse effect of not insuring competence of all practitioners whose work directly affects public safety. They recognize that their service-oriented activities are not readily evaluated by the lay public; average citizens may not be expected to have adequate knowledge to protect them from manifestations of bad practice.

Landscape Architects want licensure in order that they may compete, without restraint, for work both within as well as outside of their home jurisdictions.

5. WHY CANNOT LANDSCAPE ARCHITECTS BECOME LICENSED UNDER PRESENT LAW AS ARCHITECTS, ENGINEERS, OR LAND SURVEYORS?

The critical elements here are the separate and distinctly different definitions of the respective professions which reveal activities of often overlapping but quite distinct scope or range. There would be legally indefensible inconsistencies in not recognizing the horticultural background underlying the distinctly unique body of knowledge, and concomitant skills, through which their knowledge is manifested in the contemporary practice of Landscape Architecture. The specialized services offered by architects, engineers, and land surveyors do not derive from knowledge developed out of horticultural context. However, among the things Landscape Architects often do have in common with architects and with some kinds of engineers are design-oriented activities. Among the things Landscape Architects have in common with surveyors are knowledge and skills in topography and grading.

Another critical element lies with the educational background and other qualifications necessary for a candidate to fulfill in order to even sit for licensure examination of other professions. No person should be obliged to face unreasonable requirements that would prevent his sitting for examination. We should recall that provisions of due process must apply not only to license holders but also to applicants.

6. WHAT IS THE FORMAL TRAINING OF LANDSCAPE ARCHITECTS?

After completing high school, there are several levels of education available in Landscape Architecture. These include vocational programs (certificates or Associate degrees), pre-professional programs (Baccalaureate degrees), undergraduate professional degree programs (Bachelor of Science in Landscape Architecture), and graduate professional degree programs (Master of Science in Landscape Architecture or Master of Landscape Architecture). Vocational programs entail about two academic years of study and a summer of field experience. These programs normally focus on residential and commercial scale projects and emphasize practical knowledge, such as construction detailing, grading, horticultural practices, grounds maintenance, and business practices. The purpose of these programs is to train leaders for the landscape industry, thus studio courses stress detail scale design such as surfacings,