



December 26, 2018

Richard Ifft, Senior Insurance Regulatory Policy Analyst  
Federal Insurance Office, Room 1410 MT  
Department of the Treasury  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

Re: Proposed data collection forms for use in the 2019 TRIP Data Call

Dear Mr. Ifft,

AIR Worldwide would like to submit the following suggestions for changes to the exposed draft, specifically the Reinsurance Section Location B dirty bomb scenario.

1. Specifying the car bomb of 20 pounds of TNT appears to be irrelevant, we suggest removing it.
2. The AIR Terrorism model uses kilograms rather than pounds to designate nonconventional attack material amounts. The dirty bomb weapon considers 1 kg of Cesium, which is roughly 2.2 lbs. We therefore suggest the instructions specify a range (e.g. 2-3 lbs) rather than a single value.
3. Could FIO clarify that the 500 workers in total refers to the general population of workers, and could be considered an industry injury number. To get their injured worker count, a respondent should apply a market share assumption.
4. The Location A scenario contains the wording, "if your group or company typically utilizes different damage assumptions for an explosion of this magnitude, please use those alternative assumptions." We suggest that similar wording be included in the Location B scenario description as well, if that is the FIO's intention.

Best regards,

Brandie Andrews, CCM  
Vice President



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