



December 2, 2016

Lorilee Medders, Ph.D., Chair  
Florida Commission on Hurricane Loss Projection Methodology  
Post Office Box 13300  
1801 Hermitage Boulevard, Suite 100  
Tallahassee, Florida 32308

RE: Monroe County Hurricane Loss Projection Model Results

Dear Dr. Medders:

Fair Insurance Rates in Monroe (FIRM) attended the August rate hearing for Citizens Property Insurance Corporation (CPIC). At the hearing there were several issues raised relating to the models that were used to determine their rates. Commissioner Altmaier stated that he would ask the Florida Commission on Hurricane Loss Projection Methodology (Commission) to review certain model aspects and characteristics as they relate to Monroe County. With that in mind we would like to present several additional items for the Commission to consider at the December 13, 2016 meeting.

We respectfully request that the Commission address the following issues:

1. We request that Commission look at the geographic standards and formulas that are currently being used and whether or not the concentration and distribution of risk unique to the geography of Monroe County are taken into account. Monroe County is linear--approximately 120 miles long and approximately 4 miles at its widest point. It is the largest county in Florida by total area (3,738 square miles) with a total land area of 137.3 square miles. As of the 2010 census the population was 73,090 with an average density of 532.34 per square mile, although much of the population is concentrated in a few areas of much higher density, such as the City of Key West and Key Largo which are over 100 miles apart.
2. We request that findings from our vulnerability study be incorporated into the models. Features such as roof type, roof deck attachments and opening protection need to be specifically reviewed.
3. We seek understanding as to why the Structural Engineer appointment to the Commission that was approved by the Florida Legislature in 2013 remains vacant.

**FAIR INSURANCE RATES IN MONROE**

**(305) 294-FIRM (3476) - 422 Fleming Street #5 - Key West, FL 33040**

**[www.firmkeys.org](http://www.firmkeys.org) [facebook.com/FIRMKeys](https://www.facebook.com/FIRMKeys) [firmkeys@gmail.com](mailto:firmkeys@gmail.com)**

**A COPY OF THE OFFICIAL REGISTRATION AND FINANCIAL INFORMATION MAY BE OBTAINED FROM THE DIVISION OF CONSUMER SERVICES BY CALLING TOLL-FREE (800-435-7352) WITHIN THE STATE. REGISTRATION DOES NOT IMPLY ENDORSEMENT, APPROVAL, OR RECOMMENDATION BY THE STATE.**

FIRM Requests to FCHLPM

December 2, 2016

Page Two

4. We request that we be allowed the opportunity to present recommendations regarding the terms reliable, evaluation and accuracy on wind and flood loss projections.
5. We request the ability to discuss oversight and requirements of inputs to determine outputs for projections.
6. We request that we be allowed to present recommendations for changes to the process, procedures or forms used by the Commission.
7. We request that the Commission consider meeting on a consistent annual basis, even if approvals are bi-annual.

Thank you for your assistance and consideration of this request. Please feel free to contact me if you have any questions.

Best regards,

A handwritten signature in black ink, appearing to read "Mel Montagne". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mel Montagne,

President