

REQUESTOR NAME: **Richard T. Landale BCUC Intervener C2**

INTERVENER ARGUMENT

TO: INSURANCE CORPORATION OF BRITISH COLUMBIA

DATE: **February 27th 2017**

PROJECT NO: **3698890 BCUC**

APPLICATION NAME: **ICBC 2016 REVENUE REQUIREMENT APPLICATION**

*When one door closes, another opens.
But often we look so long, so regretfully, upon the closed door,
that we fail to see the one that is opened for us.*

Helen Keller

*I believe firmly that in making ethical decisions,
man has the prerogative of true freedom of choice.*

Corliss Lamont

1.0 REGULATORY HEARING PERFIDY

SINCE the British Columbian Utilities Commission has lost its mandate courtesy of the Order In Council OIC-960-16 December 16th 2016, followed by SUSPENDING the Regulatory Hearing Timetable per G-2-17, and issuing their revised Regulatory Hearing Timetable February 24th 2017 per G-23-17, Exhibit A-17. It's all a mess...!

Therein the Commission destroyed the fundamental principle of **PUBLIC engagement** in this apparent independent regulatory hearing process.

Yes, the Commission always has the power to establish the hearing process. But never did I imagine for a moment, the Commission would totally alter the process once the hearing process had been established by G-163-16 November 10th 2016.

Yes, it was clear the suspension order indicated the Commission would in time establish the remaining process.

Yes, it was clear the remaining process may be limited to two components.

But...NO, it was never contemplated interveners were going to lose the proceeding process of submitting evidence.

Yes, interveners were given the opportunity to submit commentary of the remaining process.

Yes, I had my moment, I made my submission, Exhibit C2-8, then the Commission denied my fundamental right to submit evidence, as had been established by G-163-16, which was due January 9th 2017. I lost over a month's work (more than 120 unpaid hours of review, research, assembly and composition of evidence), explicitly based on components from within the 2016 RRA.

This is the moment that; *upon the closed door, we see the one that is opened for us, with the prerogative of true freedom of choice.*

I'll never trust the Commission again, when the door is open I will enter through all that I believe to be necessary, forcing the Commission and ICBC to deal with it then. I mistakenly trusted the Commission in my submission January 16th 2017 Exhibit C2-8, and the Commission slapped me down...! in their response G-23-17 Exhibit A-17.

I further mistrust the Commission to address ICBCs 2017 RRA fairly by their "EXCLUSION" of interveners to consult with ICBC, BCUC Staff and interveners perhaps at a Workshop before the 2017 RRA is filed in August 2017. The Commission by their directive has already established a wall to block interveners in the ICBC 2017 RRA.

A REAL ACT OF PERFIDY

Definition of perfidy

perfidy - "acts inviting the confidence of an adversary to lead him to believe that he is entitled to, or obliged to accord, protection under the rules

Origin of perfidy French *perfidie*; from Classical Latin *perfidia*; from *perfidus*, faithless; from *per fidem* (*decipi*), (to deceive) through faith; from *per* (see per) + *fides*, faith

2.0 REMAINING PROCESS

- 2.1 As per G-23-17, “The Panel “sides” with ICBC and determines that the scope for the remainder of the proceeding be restricted to providing argument on the two outstanding requests from the Application, quote: “(i) DPAC Allocation Methodology and (ii) Government Initiatives Reporting Requirement”
- 2.2 In my Exhibit C2-8 January 26th 2017 on remaining process I had advised the Commission, I would enter into evidence the following topics: Regulatory Timetable, Indicated Rate Change by Order, Legislative Framework, CPP, Impact on Seniors, Premium Escalation, MTC, Public Consultation, BC Weather, ICBC Reporting.
- 2.3 Given G-23-17, that which remains is Government reporting, or ICBC reporting.
- 2.4 Please correct me if I am wrong, “**there is a presumption that exhibits and evidence already accepted and on file will be the basis on which the Commission Panelists will formulate their final decision on**”. This is a direction question, seeking specific confirmation from the Commission.
- 2.5 Because the Commission has ruled interveners cannot submit evidence (by exclusion) beyond the remaining two outstanding requests in G-23-17, how will the Commission Panelists view the “Beautiful British Columbia Precipitation Report 2016” submitted by me. I need to know as in my prepared evidence (which I cannot submit now), I discuss this report, including additional Environment Canada Stats updated for 2016, with further 2016 analysis. I need to know how to approach 2017 RRA, while incorporating 2016 weather. For example, November 2016 starts the PY2016/17 year, as basically October, November, December and parts of January and February combine to a brutal precipitation winter for all British Columbia.
- 2.6 As the Commission has directed¹ ICBC and BCUC Staff to collaborate ahead of August 31st 2017 schedule ICBC 2017 RRA submission date, then surely it is not unreasonable for this intervener to seek collaboration and cooperation from ICBC, BCUC Staff and the Commission Panelist on the same level, on the same platform / playing field.
- 2.7 I am specifically asking for this directive from the Commission Panelists, to direct ICBC² and the BCUC Staff to consult with me in a timely manner on matters pertaining to British Columbia Precipitation for PY2016/17 and PY2017/18, and the ICBC respective model/s/ing data. Being mindful I will require at least two months to develop appropriate information for the upcoming August 31st 2017 submission date.

1. Therefore, the Panel directs ICBC to meet with Commission staff before submission of the 2017 RRA and encourages them to reach consensus on the form and content of the 2017 RRA, including the results of the Independent Review if those results are available before the August 31 legislated filing date.
2. Please refer to 2016.2 RR RL.8.1-2 for ICBCs response, in part; quote: “Mr. Landale in his August 4, 2016 email did not indicate an expectation of meeting with the author about the report.”

3.0 ICBCS APPLICATION TO DISCONTINUE REPORTING

3.1 On page iii of the application paragraph 6, ICBCs requests, quote:
“ICBC is applying to discontinue the quarterly reporting requirement for government initiatives while continuing to report annually as a chapter in each revenue requirements application. Moving to annual reporting only is a streamlining opportunity that would allow for sufficient regulatory review of government initiatives while maintaining an efficient process for both the Commission and ICBC.”

3.2 Within the application ICBC cites many other quarterly reporting functions within house, while externally has many investment management quarterly reports required by ICBC. Chapter 9 - REPORTING ON GOVERNMENT INITIATIVES is dedicated to ICBC explaining the varied reporting systems, and review oversight. Of particular interest is their footnote on page 9-4, quote:

“³ The Commission has not provided comments or questions on any of these quarterly Government Initiatives Report”.

First: I've learned the hard way, the Commission has no apparent obligation to ask questions or provide comments. Why should the Commission treat ICBC any differently from Interveners submitting reports and hoping for “*feedback*”, questions and/or comments ? The Commission must treat everyone equally – right ?, e.g: Applicant, Stakeholder, Intervener, Letters to the Commission, and so on.

Second: What obligation does the Commission have to ICBC to put forward questions and or comments on any annual, semi-annually, quarterly or otherwise report ICBC files with the BCUC ? *a fair question to both the Commission and ICBC.*

3.3 On page 9-3 Section D PROPOSAL TO DISCONTINUE QUARTERLY REPORTING ON GOVERNMENT INITIATIVES, paragraphs 15 to 22, provides the details, the agreements ICBC made with the Commission as far back as 2009.

3.4 On page 9-5 Section E CONCLUSION, paragraph 23, quote: “ICBC submits that through the information provided in this Chapter, ICBC meets its commitments to provide reporting on Government Initiatives. It also provides the necessary transparency regarding ICBC’s involvement in Government Initiatives.” ICBCs reference here is more of a submission of their opinion, rather than in fact. Transparency is more in the eyes of the beholder – reader, than in ICBC making such a submission of opinion. Without reporting, there is no transparency.

3.5 An obvious counter to ICBCs claim for maintaining quarterly reporting transparency a necessity, versus annual reporting. After say two quarters, a trend may emerge requiring special questions or comments, with the view to correction or adjustment. Thereby validating quarterly reporting to the Commission transparent, as quarterly reports are more reflective to a given state / action relating to government initiatives in a timely cause and effect approach, while ensuring / providing timely oversight.

3.6 Is ICBC claiming the Commission has an overarching responsibility to submit questions and comments on every report ICBC files ?, (*or perhaps to complain of the apparent “indifference” of the Commission by not submitting questions, and or comments back to ICBC ??*). (*this interveners observational comment*).

that question comes from ICBCs submission January 23rd. 2017 Exhibit B-13

3.7 In almost every year I have questioned ICBCs transparency, with this year being no different. All the existing reporting agreements ICBC has with the Commission should continue to ensure continuity, and transparency. It is up to the Commission to utilize these reports as the BCUC and staff see fit, with or without questions or comments. Timely, responsive oversight is always appropriate, quarterly reporting establishes this opportunity for independent review and timely oversight on government initiatives.

Hey - ICBC, you agreed in 2009... !

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3.8 I further note, ICBC has extensive quarterly reporting requirements from their investment managers. Please refer to the application, "Attachment 4 A1 – Statement of Investment Policy and Procedures Dated May 12, 2016". Where all their various incoming quarterly reports are detailed, including a report from; quote: "Investment manager(s) will be measured, before fees, on a quarterly basis by an external performance measurer".

What's good for the goose, is good for the gander !

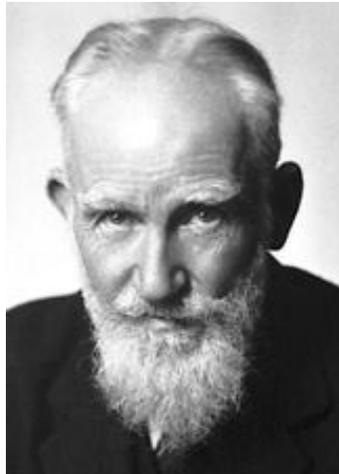
3.9 To the best of my knowledge since PY2011, I have sent letters and by now a 100 questions (*a rough estimation*) to the Commission Secretary (*everything has to be addressed to the Secretary*), seeking all kinds of information, asking after a huge array of subjects, not all about ICBC. However the Commission chooses what responses they elect to make is a mystery to me. Again, I am guessing, I have received no more than 10 fulsome replies in all this time. Although since the BCUC in 2015 has adopted their new performance measures, things have improved slightly - a little.

Currently I am still awaiting a reply from the BCUC Chair on another matter, now coming up to 4 weeks. I have tried to expedite a response by even discussing the issue with the Commission Acting Secretary on the telephone, I am still waiting. It is hard for me to have any sympathy for ICBCs justifications to request annual reporting on government initiatives, as opposed to continuing with ICBCs prior quarterly commitments to the Commission.

3.10 Throughout my information requests, sometimes in procedural conferences, (not necessarily only in ICBC hearings), the Commission Panel has either evaded, ignored, or redirected my questions. I have never ever received a written letter or email from any Commission Panel, let alone the Commission Chair. They have never even thanked me for my BC Weather report I submitted last year. I have no idea whether the Commission staff have even turned a page of that report. (*at the moment I think not*).

3.11 Yes, I am upset by that fact, believe it or not, that emotion turns me on, yes it motivates me. My wife says I am obsessed, Hmmm, I won't disagree. In closing this topic, I leave the Commission and ICBC with this motivating quote in these matters:

Indifference: The Essence of Inhumanity



George Bernard Shaw

"The worst sin towards our fellow creatures is not to hate them, but to be indifferent to them: that's the essence of inhumanity."

If you're into facial recognition; look into his eyes...! for the emphaticness of this quotation.

4.0 DEFERRED PREMIUM ACQUISITION COST (DPAC)

4.1 I am confused by ICBC literature, for example; paragraph 6 page iii; quote:

“deferred premium acquisition cost (DPAC) between Basic insurance and Optional insurance. This change is driven by financial reporting requirements and does not impact the rate indication or the Outlook Minimum Capital Test (MCT) Ratio.”

Then: from ICBC 2016/17 – 2018/19 Service Plan

Operating Segments

Operating Costs by Nature \$ millions	2014 ¹ Actual	2015 Forecast	2016 Budget ²	2017 Budget ²	2018 Budget ²
Premium taxes and commissions expense	\$532	\$564	\$605	\$636	\$659
Premium deficiency adjustments (DPAC)	(36)	70	(40)	11	30

4.2 **Then:** from ICBC 2014 Annual Service Plan Report. The 2015 Report appears to follow the same format.

Acquisition Costs Page 21, quote:

“At year-end, the unexpended portion of these costs are deferred and reflected as deferred premium acquisition costs (DPAC) in the amount of \$152 million (**see note 17 of the accompanying consolidated financial statements**). DPAC is written down and recognized as a premium deficiency when future claims and related expenses, after consideration of investment income, are expected to exceed unearned premiums. This was the case in 2014 for the Basic business although to a lesser degree than 2013. Conversely, where there has been a previous premium deficiency, a positive adjustment is made to eliminate the premium deficiency when unearned premiums are expected to exceed future claims and related expenses.” (underlined for focus).

“Acquisition costs (including non-insurance commissions) were \$72 million lower than 2013. This was mainly due to a lower expected loss in **the Basic business** as a result of the Basic rate increases (4.9% effective November 1, 2013, 5.2% effective November 1, 2014 as well as the rate adjustment of 0.3% for the 2013 rate differential), which allowed for an increase in the amount of **acquisition costs deferred**. This was partially offset by higher broker commissions of \$10 million and higher premium taxes of \$7 million due to higher premiums earned”.

Then: on Page 22

“Premium taxes and commissions of \$496 million were \$30 million lower than plan due to a more **favourable DPAC adjustment** due to the lower expected loss of **the Basic business** as a result of lower anticipated injury claims costs, **which allows for an increase in the deferral of acquisition costs**”. (*emphasis added*).

Then: on Page 25

Key Financial Data for the Past Five Years

Five year comparison ¹ for the years ended December 31	2014	2013	2012 ²	2011	2010
For the year (\$000):					
Premiums earned	4,128,020	3,927,694	3,811,386	3,673,210	3,667,324
Service fees	59,310	56,640	53,797	50,352	54,628
Provision for claims occurring in the current year	3,378,576	3,167,560	3,022,699	2,880,130	2,754,077
Change in estimates for losses occurring in prior years ³	181,426	(54,390)	(69,234)	(14,392)	(2,039)
Claims services, road safety and insurance operating costs	504,206	488,577	492,536	497,465	505,923
Transformation Program (TP) expenses	23,961	28,578	24,441	31,645	34,775
Insurance premium taxes and commissions	504,324	487,742	474,392	457,437	446,015
Deferred premium acquisition cost (DPAC) adjustments ³	(36,445)	52,946	(11,351)	59,924	31,180

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Then: NOTE 17, pages 76 and 77, quote:

17. Deferred Premium Acquisition Costs and Prepaids and Premium Deficiency

The deferred premium acquisition costs for the Optional line of business are as follows:

(\$ THOUSANDS)	2014	2013
Deferred premium acquisition costs, beginning of year	\$ 147,300	\$ 140,580
Acquisition costs related to future periods	151,996	147,300
Amortization of prior year acquisition costs	(147,300)	(140,580)
Deferred premium acquisition costs, end of year	\$ 151,996	\$ 147,300
Deferred premium acquisition costs	\$ 151,996	\$ 147,300
Prepaid expenses	19,454	10,002
Deferred premium acquisition costs and prepaids	\$ 171,450	\$ 157,302

The premium deficiency for the Basic line of business is as follows:

(\$ THOUSANDS)	2014	2013
Premium deficiency, beginning of year	\$ (56,662)	\$ (5,550)
Acquisition costs related to future periods	89,061	84,638
Amortization of prior year deficiency	56,662	5,550
Actuarial valuation adjustment	(104,855)	(141,300)
Premium deficiency, end of year	\$ (15,794)	\$ (56,662)

The commission and premium tax expenses reflected in the consolidated statement of comprehensive income are as follows:

(\$ THOUSANDS)	Commissions	Premium Taxes	Total
December 31, 2014			
Amount payable	\$ 353,874	\$ 187,929	\$ 541,803
Amortization of prior year deferred premium acquisition costs	88,370	2,268	90,638
Deferred premium acquisition costs	(115,892)	(36,104)	(151,996)
Premium deficiency	6,423	9,371	15,794
Premium taxes, commission expense and deferred premium acquisition costs	\$ 332,775	\$ 163,464	\$ 496,239
Represented as:			
Insurance	\$ 304,415	\$ 163,464	\$ 467,879
Non-insurance	28,360	-	28,360
	\$ 332,775	\$ 163,464	\$ 496,239
December 31, 2013			
Amount payable	\$ 344,108	\$ 179,813	\$ 523,921
Amortization of prior year deferred premium acquisition costs	85,525	49,505	135,030
Deferred premium acquisition costs	(111,925)	(35,375)	(147,300)
Premium deficiency	23,555	33,107	56,662
Premium taxes, commission expense and deferred premium acquisition costs	\$ 341,263	\$ 227,050	\$ 568,313
Represented as:			
Insurance	\$ 313,638	\$ 227,050	\$ 540,688
Non-insurance	27,625	-	27,625
	\$ 341,263	\$ 227,050	\$ 568,313

Where are all these accounting items reported in Figure 3.3

Where is the "Deferred Premium Acquisition Cost (DPAC) Adjustment" of \$36,445,000, as noted in Table on page 5

4.3 ICBC introduces their new DPAC in paragraph 6 page iii, quote:

ICBC is requesting approval of a proposed allocation methodology for the deferred premium acquisition cost (DPAC) between Basic insurance and Optional insurance. This change is driven by financial reporting requirements and does not impact the rate indication or the Outlook Minimum Capital Test (MCT) Ratio.

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4.4 **Then:** in paragraph 7 page 3-2, quote: **“ICBC is requesting approval of a proposed allocation methodology for the deferred premium acquisition cost (DPAC) between Basic insurance and Optional insurance.** This change is driven by financial reporting requirements and does not impact the rate indication or the Outlook Minimum Capital Test (MCT) Ratio.” *(emphasis added)*.

4.4.1 More confusion, ICBC says it will not affect the rate indication, or the outlook MCT Ratio. This statement is not supported within the following paragraph exhibits offered as “Argument”. Please read on for discussion on MCT.

The Commission slapped me down in their G-23-17 for not explaining my thoughts, so I now am including every reference, by discussing every issue, quote: “He asserts that his evidence does not interfere with either order [OIC 960/16 and Order G-2-17],but it does discuss the issues surrounding the OIC and General Order. His evidence will cover topics in the application, including the regulatory timetable, indicated rate change by order, legislative framework, Canada Pension Plan, impact on seniors, premium escalation, minimum capital test, public consultation, BC weather, and ICBC reporting”

4.5 In Chapter 3 of the application, Section D NEW APPROACH FOR DETERMINING BASIC DPAC, paragraphs 19 to E Conclusion paragraph 26, sets out ICBCs new methodology. Within these paragraphs ICBC provides Figure 3.3 – Outlook 2016/17 Year-End Basic DPAC. This table is not comparable to ICBCs reporting in 2013, 2014, and 2015 Financial Reports to the Government, as shown above.

4.6 ICBC has not provided a table, a figure or any numerical interpretation of how their new DPAC methodology will work, beyond some whimsical representation in Figure 3.3.

4.7 I believe there are four issues / arguments the Commission Panel must overcome before granting their approval, adoption of ICBCs new DPAC calculations that apparently now comply with IFRS (Chapter 3 para 20 in the application), in reference to my emphasis in paragraph 4.4 above.

4.8 **The First:** One must raise the question, why is ICBC only now complying with the IFRS. The Government has ordered other capital transfers to bolster the MCT. Were those circumstances contrary to IFRS. ICBC has not provided the overarching IFRS chapter and verse that explicitly requires the new methodology to calculate DPAC Basic / Optional / Corporate and the allocation ratio. We only have in evidence ICBCs viewpoint seeking approval. Is it the right one, how have other Canadian Industry actuaries in the private or in the public auto insurance business prepared their DPAC split. There is no evidence to support ICBCs request from industry, beyond that which poorly purports a methodology.

4.9 **The Second:** What is the best balanced ratio of allocation between Basic and Optional, in such a manner as to equal the Corporate DPAC. ICBC proposes this is a moving target as generally described in paragraphs 22, 23, 24, 25, then summarized in their Conclusion paragraph 26. What is the Ratio the Commission Panelist will approve.

4.10 **The Third:** Reference, quote: “21. To date, the Basic DPAC has been calculated directly. ICBC is proposing an allocation approach to determine the Basic DPAC, which is described below and has been used **in calculating the DPAC underlying the Outlook MCT ratio in this Application.** This allocation approach produces the same amount of Basic DPAC as the direct calculation for the 2016/17 Outlook, **and under normal circumstances will generally continue to produce the same amount.**” *(underlined for focus)*. There are two issues here of concern.

4.10.1 **One:** ICBC (para 25) has apparently gone ahead to use this new methodology before the Commission has granted approval, and that this new methodology did have an impact in the calculations of the MCT Outlook. How so? The Government bailed ICBC out with OIC-960-16 to bolster the MCT back up again, after all the actuarial miscalculations were not acceptable.

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4.10.2 **Two:** Since 2011 ICBC cannot claim these past 6 years as **normal**, where over 2 billion dollars have been expropriated by the Government from Optional insurance business, split between the Government and Basic insurance business.

4.11 **The Fourth:** However the DPAC is calculated going forward, ICBC demonstrates the far reachings' of how DPAC affects even the Cost Per Policies in Force, page 6-15, quote:

Figure 6.5 – Cost Per Policy In Force

Cost Per Policy In Force	2013 Actual	2014 Actual Restated ²	2015 Actual	2016/17 Outlook ³
Internal Operating Costs	\$138	\$154	\$144	\$149
External Expenses	60	62	65	71
Premium Taxes and Commissions	139	141	143	153
DPAC Adjustments ¹	15	(10)	18	(4)
Total	\$352	\$347	\$370	\$369

¹ DPAC adjustments are made to the deferred balance of acquisition costs to reflect only those amounts that relate to future periods and are actuarially determined to be recoverable from the underlying business.

Please also read Footnote 1. In Chapter 3, ICBC does not discuss DPAC impact on Cost Per Policy In Force, or referenced in Figure 3.3 Exactly what is the Commission Panelist approving? What will be all the downstream ripple effects be? Do we know?

4.12 Now turn to Paragraph 75, page 6-16, quote:

“75. As seen in Figure 6.5, the Cost Per Policy In Force for 2015 increased in comparison to the restated 2014 actual mostly due to an unfavourable DPAC adjustment resulting from an increase in claims costs. The 2016/17 Cost Per Policy In Force outlook of \$369 is slightly lower than the 2015 actual of \$370 and the 2015 outlook of \$375. Below is a discussion of each component of the Cost Per Policy In Force”.

It gets better in paragraphs, quote:

“80. Acquisition costs include premium taxes collected and paid to the provincial government, commissions for the sale of ICBC’s insurance products, and DPAC adjustments. Premium taxes and commissions increased from the 2015 actual results (\$143) and 2015 outlook (\$144) to the 2016/17 outlook (\$153) primarily due to higher premiums.”

“81. ICBC’s DPAC is written down when future claims and related expenses, after consideration of investment income, are expected to exceed unearned premiums. Conversely, where there has been a previous write-down of DPAC, a positive adjustment is made when unearned premiums are expected to exceed future claims and related expenses. The 2015 DPAC adjustment resulted in an unfavourable impact of \$18 per policy primarily due to an increase in claims costs. Based on the most recent financial outlook, the DPAC adjustment is expected to be a favourable adjustment of \$4 per policy for 2016/17.”

4.13 I have to ask, why are premium taxes rolled into DPAC calculations, since the tax dollars are rolled through directly to the Government, and are not ICBC assets to play with?

4.14 Going back to Chapter 3, paragraphs 22,23,24, there is no link to investments, as made in paragraph 81 above. ICBC only refers to earned and unearned premiums, and costs.

4.15 Can the Commission Panelists reconcile the new DPAC methodology with Figure 10C.3 – Historical Information, note 6, quote: “6 Expense ratio excludes DPAC adjustment whereas combined ratio includes the DPAC adjustment.”...? what’s that all about ...?

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- 4.16 So the argument against accepting ICBC new DPAC methodology is;
Exactly what is the Commission Panelist going to approve. An "Idea", a "Scheme",
"a Once in a Life Time Methodology".
ICBC has not provided a calculation structure for the new DPAC methodology, such as
an "algorithm, a formula, a methodological line by line item table, (perhaps comparable
to an "OFSI Key Metric Report"), or at least something like that. So that everyone making
decisions, including the Government can follow and eventually understand the new
DPAC methodology, even when looking into the future for forecasting purposes.
- 4.17 Returning to pages 5 and 6, and the tables thereon, ICBC has not demonstrated how this
new DPAC methodology aligns with these tables and Figure 3.3, as provided in the
RRA. Read the line items and the dollars over the years, names infer different things,
and the dollars look like the TSE index switching between a Bear/Bull market. ICBCs
idea of reporting continues the illusive evasions of accountability, reconcilability and
transparency noted in my prior submissions over the years.
- 4.18 DPAC is following the mystique of the MCT..... this is just not good enough.
- 4.19 I did not connect the dots to Earned, Unearned Premiums, the MCT Outlook, IFRS,
DPAC adjustments, Commission sales, Premium Taxes, Investments, Costs. These
components were all furnished by ICBC in their RRA.
- 4.20 What is the Commission Panelist approving...?
 - Be specific in your final reasoning,
 - Be specific in your final decision.
- 4.21 We have now come full circle to where this argument began:

*When one door closes, another opens.
But often we look so long, so regretfully, upon the closed door,
that we fail to see the one that is opened for us.*

*I believe firmly that in making ethical decisions,
man has the prerogative of true freedom of choice.*

Respectfully submitted,



Richard T. Landale.
Intervener C2

PS:

I would not want to be in yours shoes for any stipend, there's no integrity in it.