



**BlueCross BlueShield
of Wyoming**

A member of the Blue Cross and Blue Shield
Association, An Association of Independent
Blue Cross and Blue Shield Plans.

December 19, 2003

Honorable Kenneth Vines
Insurance Commissioner
State of Wyoming
122 West 25th Street
Cheyenne, WY 82002-0440

Dear Commissioner Vines:

We have received your Department's Examination Report of Blue Cross Blue Shield of Wyoming as of December 31, 2002. We appreciate the opportunity to provide our written comments to the recommendation contained within the report. It is our understanding that this letter will become a permanent part of the public Examination Report.

The one recommendation in the report discusses Group Master Agreements and states, "It is recommended that the Company continue to work on the implementation of procedures to ensure that all Group Master Agreements are on file and signed in a timely manner."

The Application for Group Master Agreement is a form that is signed by an employer group once coverage is effective and basically states that the employer agrees to be bound by the rules governing its specific insurance coverage. Blue Cross Blue Shield of Wyoming does not believe this is a critical piece of documentation to have on hand, as the group is still required to sign a separate acceptance of coverage before any policies are issued. Currently, the Group Master Agreement cannot be issued until after the coverage becomes effective. As a result, the Company's leverage to obtain the necessary signatures becomes weakened as the coverage has already been issued. However, the Company does understand the Department's position, in that certain statements within this document could serve to protect the Company. To that extent, the Company is exploring options to include key statements from the Application for Group Master Agreement into the documents that are signed at the point of coverage acceptance. If that alternative is not found to be feasible, the Company will implement further follow up procedures with employer groups in an attempt to ensure the timely signing of the Application for Group Master Agreements.

Please feel free to contact us should you need further clarification or comment. Additionally, we would like to thank your staff for their professionalism and courtesy extended to us throughout the examination.

Sincerely,

Diane G. Gore
Chief Financial Officer