Asia e-Alert

8 April 2013

India Motor



Update on IRDA motor third-party insurance tariff

This is an update on an e-alert issued by Milliman on 4 March, 2013 relating to proposed increases of motor third-party (TP) insurance tariff for the financial year 2013-2014 (1 April 2013 to 31 March 2014). On 26 March 2013, the Insurance Regulatory and Development Authority (IRDA) released a final TP tariff after consultation with the industry.

Final tariff increase significantly lower than initial proposal

Since the release of exposure draft on the proposed revision of premium rates, the IRDA has received major negative reactions from transporters associations across the country. The transporters associations complained that the proposed level of increase, for certain segments as high as 176%, is outrageous. The associations threatened the IRDA with nationwide strikes if the proposed increases were not withdrawn. The IRDA appears to have succumbed to political pressure from lobby groups and toned down the level of its final rate increase. It appears that commercial vehicle lobby groups have the most influence amongst the transporters associations; it is not clear how IRDA decided on the 1% reduction in premiums for goodscarrying private vehicles compared with an originally planned 11% increase in premiums. Figure 1 summarises the premium rate changes by each class.

Figure 1: Schedule of Motor Third-party Insurance Rates as of 1 April 2013

Vehicle Class	Proposed % increase over 2012-2013 Tariff		
	Exposure Draft	Final Tariff	Difference
	(a)	(b)	(c)=(b)-(a)
Private cars	39%	20%	-19%
Two-wheelers	18%	18%	0%
Goods-carrying public carriers (other than 3-wheelers)	30%	20%	-10%
Goods-carrying private carriers (other than 3-wheelers)	11%	-1%	-12%
Goods-carrying public carriers (3-wheelers)	33%	20%	-13%
Goods-carrying private carriers (3-wheelers)	10%	10%	0%
Passenger-carrying vehicles (4-wheelers)	13%	12%	-1%
Passenger-carrying vehicles (3-wheelers)	11%	0%	-11%
Special Type of Vehicle	176%	20%	-156%
Others	56%	20%	-36%

4 April 2013 milliman.com

Background

Historically, the motor third-party insurance business in India has not been profitable. Within this operating environment, commercial vehicles encountered extreme difficulties in finding cover. As a result, IRDA constituted the India Motor Third Party Insurance Pool (IMTPIP) on 1 April 2007. IMTPIP underwrote third-party liability covers for all commercial vehicles, with the risks shared by insurers.

However, IMTPIP brought about further deterioration of underwriting results for insurers. On 23 December 2011, the IRDA issued an order (order reference: IRDA/NL/ORD/MPL/276/12/2011) to dismantle the IMTPIP with effect from 31 March 2012.

In replacement, the Declined Risk Insurance Pool (DR Pool) was set up effective from 1 April 2012 to provide insurance to risks that cannot find cover from insurers in the market. All motor insurers are members of the DR Pool. They are required to underwrite a minimum number of commercial motor third-party policies, and the minimum premium volume can be prescribed by the IRDA each year. Insurers that fail to meet the minimum criteria are forced to insure risks from the DR Pool.

Annual revision of premium rates

Since 2011, IRDA reviews and adjusts motor insurance premium rates for third-party liability cover and publishes an exposure draft on its website at the beginning of the year. Upon receiving responses on the exposure draft, IRDA holds a series of discussions with transporter associations and insurers.

Premiums are reviewed regularly depending upon three factors:

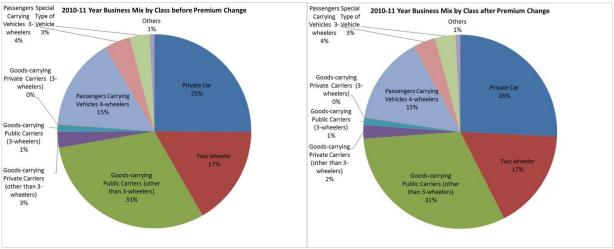
- 1. Average claim cost for each class of vehicle
- 2. Frequency of claims for each class of vehicle
- 3. Cost Inflation Index for the year of review

The premium adjustment is determined by using a prescribed formula that takes into account the Cost Inflation Index and adjustment factors determined by IRDA.

Potential impact of premium change in 2013-2014

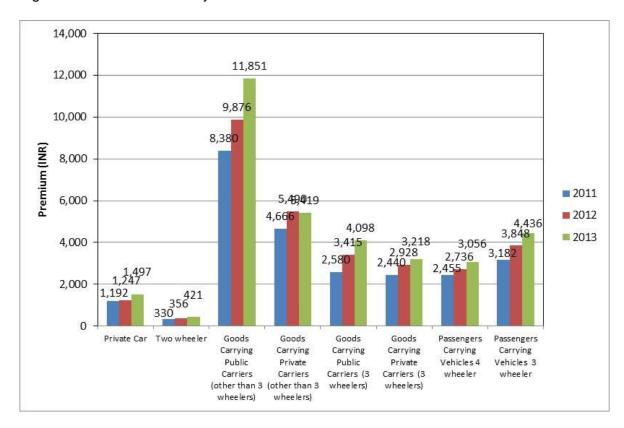
Milliman obtained data on motor TP insurance from the Insurance Information Bureau (IIB). According to reports from 2010-2011, the total premium of motor TP insurance is around INR 51,320 million. After allowing for the premium change, it will increase by 17% to around INR 60,006 million. The adjustment on the premium rates will also lead to a different business mix and average premium, as shown in Figures 2 where we will see slight increases in the proportion of private car and two-wheeler premiums, and a lower mix of goods carrying and passenger carrying vehicles. In calculating the average premium, we have assumed that the proportion of each subclass within each vehicle class is to remain unchanged.

Figure 2: TP Business Mix by Vehicle Class



Although IRDA has been increasing TP tariff over the past years, the finalised 2013-2014 change is the most material in recent times, as illustrated in Figure 3 below.

Figure 3: TP Business Mix by Vehicle Class



The rate revision is expected to have a material and positive effect on loss ratios and motor profitability overall, although the extent of the impact is more mild compared to the initial proposal in February. For illustration purposes, ignoring claims inflation and assuming that the mix of vehicles remains stable, the increases in premium rates are likely to improve the overall TP loss ratio by 16% points. Figure 4 shows the estimated difference in loss ratios by vehicle class.

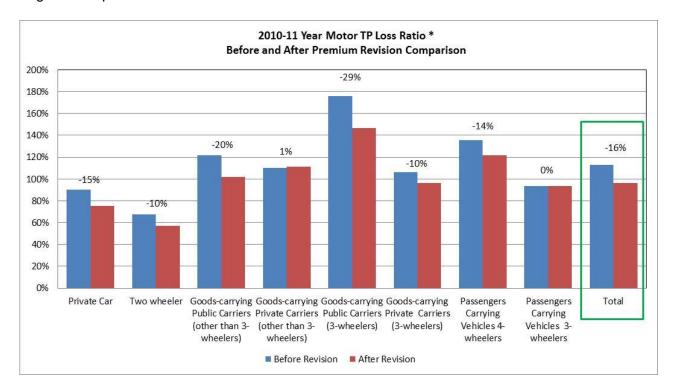


Figure 4: Improvement in Loss Ratios After Rate Revision

Note: We have used 2010-2011 underwriting year data (source: Insurance Information Bureau) as a basis of estimating the impact of loss ratio movement. The reported loss ratios may not reflect the true underlying loss ratios of the industry, as we do not know the extent of provision made for incurred but not reported (IBNR) claims.

For Goods-carrying Public Carriers (other than 3-wheelers) and Private Car, which are the two largest classes, the loss ratios improve from 122% and 90% to 102% and 75%, respectively. This contributes significantly to the improvement of overall loss ratio, from 113% to 96%. The improvements in the loss ratios for Special Type of Vehicle and Others are also significant.

Overall, it is expected that the loss ratio would improve by almost 17% points for TP business and 4% points for motor business overall, if we ignore future claims inflation and assume no major change in vehicle mix. The expected improvement in loss ratios based on initial proposal by the IRDA was 27% and 8% respectively. Clearly the improvement was materially less than what insurers could initially anticipate.

Implications

The premium rate review would significantly improve the current profitability level in India. In the past, TP has been generally unprofitable across the board and insurers have relied on selling comprehensive cover to turn a profit. Now insurers may be able to target specific segments to sell TP covers that are profitable in their own right.

This increases the opportunities to develop and sell "TP plus" policies, i.e., a hybrid between TP and own damage (OD). Some insurers, in particular the private sector players, are already doing this.

With less reliance on cross-subsidies from OD cover to turn a profit, insurers may have to refine how they segment risks in order to tease out now-profitable segments that were previously unprofitable, or how they reduce prices in other segments to increase market share.

In addition, a number of policies in the DR pool may turn back to the market, as the increase in premium makes those high-risk policies a profitable business.

Overall, the increased tariffs expand the number of segments that can be written profitably. Insurers who perform actuarial risk selection analyses and sharpen their underwriting skills stand to benefit more from the increased tariffs. A boost in profitability means improving solvency margins for insurers, which in the long run is a win-win-win situation for insurers, consumers at large, and regulators. Although some insurers are likely somewhat disappointed in the eventual premium increase IRDA decided to implement for 2013-2014, the increase is certainly material and insurers may now start to see the light at the end of the tunnel.

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