



Andrew F. Sullivan
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Business

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August 26, 2013

The Honorable Dave Jones
Insurance Commissioner
State of California
Department of Insurance
300 Capitol Mall
Sacramento, CA 95814

Re: Field Claims Examination Report
Prudential Insurance Company of America (The), NAIC # 68241

Dear Commissioner Jones:

Pursuant to California Insurance Code section 12938(b)(2), The Prudential Insurance Company of America ("Prudential" or "We") hereby submits its response to the California Department of Insurance ("Department") adopted report of the market conduct examination of its Disability, Long Term Care and Group Life claims practices for the period of August 31, 2007 through September 1, 2008 ("Exam Report").

We have carefully considered and responded to each of the Department's allegations in the Exam Report. While we object to any assertion that Prudential has engaged in a pattern or practice of claims handling that violates California law, we have invested significant time and resources into enhancing our claims handling practices to provide the best possible customer experience. These enhancements are set forth in detail in the Exam Report.

Prudential strongly believes in compliance with applicable law and the quality of its customer service and has established an efficient and robust claims experience for its insureds. Specifically, we have implemented comprehensive procedures to conduct and pursue thorough, fair and objective investigations of claims. These processes are designed to provide for prompt, accurate and efficient review and payments of claims. We would like to emphasize that the enhancements and commitments made in connection with the Department's market conduct examination were undertaken voluntarily and represent Prudential's ongoing commitment to its customers and industry best practices.

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We would like to thank the Department for its professionalism and cooperation during the examination process.

Sincerely,

A handwritten signature in black ink that reads "Andrew F. Sullivan". The signature is written in a cursive style with a prominent "F" and a long, sweeping "S".

Andrew F. Sullivan

Cc: Towanda David; Bureau Chief, Field Claims Bureau