26 CFR 601.201: Rulings and determination letters. (Also Part I, Sections 846; 1.846–1.)

### Rev. Proc. 2001-60

#### SECTION 1. PURPOSE

This revenue procedure prescribes the loss payment patterns and discount factors for the 2001 accident year. These factors will be used for computing discounted unpaid losses under § 846 of the Internal Revenue Code. *See* Rev. Proc. 98–11 (1998–1 C.B. 358) for background concerning the loss payment patterns and application of the discount factors.

#### **SECTION 2. SCOPE**

This revenue procedure applies to any taxpayer that is required to discount its unpaid losses under § 846 for a line of

business using discount factors published by the Secretary.

# SECTION 3. TABLES OF DISCOUNT FACTORS

.01 The following tables present separately for each line of business the discount factors under § 846 for accident year 2001. All the discount factors presented in this section were determined using the applicable interest rate under § 846(c) for 2001, which is 6.00 percent, and by assuming all loss payments occur in the middle of the calendar year.

.02 If the groupings of individual lines of business on the annual statement change, taxpayers must discount the unpaid losses on the affected lines of business in accordance with the discounting patterns that would have applied to those unpaid losses based on their classification on the 1995 annual statement. *See* Rev. Proc. 98–11 (1998–1 C.B. 358)

section 2, for additional background on discounting under section 846 and the use of the Secretary's tables.

.03 Section V of Notice 88-100 (1988-2 C.B. 439) provides a composite discount factor to be used in determining the discounted unpaid losses for accident years that are not separately reported on the annual statement. Taxpayers that do not use the methodology set forth in section V of Notice 88-100 should instead use the discount factor for the appropriate year in the Secretary's table for that line of business. If such taxpayers have unpaid losses relating to an accident year that is older than the last accident year for which a discount factor is presented in the Secretary's table, those unpaid losses should be discounted using the discount factor for the last accident year in the Secretary's table. See section 2.03(3) of Rev. Proc. 98-11.

.04 Tables

# Accident and Health (Other Than Disability Income or Credit Disability Insurance)

Discount factor for all years equals 97.1286 percent.

### **Auto Physical Damage**

		Estimated		Discounted	
		Losses	Unpaid	Unpaid	
	Cumulative	Paid	Losses at	Losses at	Discount
	Losses Paid	Each Year	Year End	Year End	Factors
Tax Year	(%)	(%)	(%)	(%)	(%)
AY+0	89.9430	89.9430	10.0570	9.7182	96.6309
AY+ 1	99.3814	9.4384	0.6186	0.5838	94.3797
AY+ 2	N/A	0.3093	0.3093	0.3004	97.1286

#### Commercial Auto/Truck Liability/Medical

		Estimated		Discounted	
		Losses	Unpaid	Unpaid	
	Cumulative	Paid	Losses at	Losses at	Discount
	Losses Paid	Each Year	Year End	Year End	Factors
Tax Year	(%)	(%)	(%)	(%)	(%)
AY+0	25.8075	25.8075	74.1925	65.3144	88.0336
AY+1	49.8793	24.0718	50.1207	44.4497	88.6854

# Commercial Auto/Truck Liability/Medical—Continued

Tax Year	Cumulative Losses Paid (%)	Estimated Losses Paid Each Year (%)	Unpaid Losses at Year End (%)	Discounted Unpaid Losses at Year End (%)	Discount Factors (%)
AY+2	67.6592	17.7799	32.3408	28.8112	89.0862
AY+3	79.7711	12.1119	20.2289	18.0699	89.3272
AY+4	88.2132	8.4421	11.7868	10.4624	88.7640
AY+5	93.1778	4.9646	6.8222	5.9788	87.6375
AY+6	95.9623	2.7845	4.0377	3.4707	85.9577
AY+7	97.0091	1.0468	2.9909	2.6012	86.9707
AY+8	97.5719	0.5628	2.4281	2.1778	89.6931
AY+9	98.2191	0.6471	1.7809	1.6422	92.2109
AY+10	N/A	0.6471	1.1338	1.0745	94.7685
AY+11	N/A	0.6471	0.4867	0.4727	97.1286
		Composite D	Discount Factors		
		Estimated Losses	Unpaid	Discounted Unpaid	
	Cumulative	Paid	Losses at	Losses at	Discount
Tax Year	Losses Paid (%)	Each Year (%)	Year End (%)	Year End (%)	Factors (%)
AY+0	35.4611	35.4611	64.5389	55.5635	86.0930
AY+1	59.1449	23.6838	40.8551	34.5133	84.4773
AY+2	70.8220	11.6771	29.1780	24.5618	84.1792
AY+3	81.9019	11.0799	18.0981	14.6281	80.8265
AY+4	86.3688	4.4669	13.6312	10.9068	80.0133
AY+5	90.0497	3.6809	9.9503	7.7715	78.1028
AY+6	92.7488	2.6991	7.2512	5.4588	75.2820
AY+7	93.8259	1.0771	6.1741	4.6775	75.7592
AY+8	94.2415	0.4156	5.7585	4.5302	78.6700
AY+9	94.8568	0.6153	5.1432	4.1685	81.0493
AY+10	N/A	0.6153	4.5279	3.7851	83.5960
AY+11	N/A	0.6153	3.9125	3.3787	86.3558
AY+12	N/A	0.6153	3.2972	2.9479	89.4060

0.6153

0.6153

2.6819

2.0665

2.4912

2.0072

92.8922

97.1286

AY+13

AY+14

N/A

N/A

# Fidelity/Surety

Discounted

Estimated

		Estimated Losses	Unpaid	Unpaid Unpaid	
	Cumulative	Paid	Losses at	Losses at	Discount
	Losses Paid	Each Year	Year End	Year End	Factors
Tax Year	(%)	(%)	(%)	(%)	(%)
AY+0	24.1540	24.1540	75.8460	70.3585	92.7650
AY+1	59.0961	34.9421	40.9039	38.6050	94.3797
AY+2	N/A	20.4520	20.4520	19.8647	97.1286
		Financial Guaranty	y/Mortgage Guarar	aty	
		Estimated		Discounted	
		Losses	Unpaid	Unpaid	
	Cumulative Losses Paid	Paid Each Year	Losses at Year End	Losses at Year End	Discount Factors
Tax Year	(%)	(%)	(%)	(%)	(%)
AY+0	9.2513	9.2513	90.7487	84.1431	92.7210
AY+1	50.5659	41.3146	49.4341	46.6558	94.3797
AY+2	N/A	24.7171	24.7171	24.0073	97.1286
			national		
		(Con	nposite)		
		Estimated	TT '1	Discounted	
	Cumulative	Losses Paid	Unpaid Losses at	Unpaid Losses at	Discount
	Losses Paid	Each Year	Year End	Year End	Factors
Tax Year	(%)	(%)	(%)	(%)	(%)
AY+0	35.4611	35.4611	64.5389	55.5635	86.0930
AY+1	59.1449	23.6838	40.8551	34.5133	84.4773
AY+2	70.8220	11.6771	29.1780	24.5618	84.1792
AY+3	81.9019	11.0799	18.0981	14.6281	80.8265
AY+4	86.3688	4.4669	13.6312	10.9068	80.0133
AY+5	90.0497	3.6809	9.9503	7.7715	78.1028
AY+6	92.7488	2.6991	7.2512	5.4588	75.2820
AY+7	93.8259	1.0771	6.1741	4.6775	75.7592
AY+8	94.2415	0.4156	5.7585	4.5302	78.6700
AY+9	94.8568	0.6153	5.1432	4.1685	81.0493
AY+10	N/A	0.6153	4.5279	3.7851	83.5960
AY+11	N/A	0.6153	3.9125	3.3787	86.3558
AY+12	N/A	0.6153	3.2972	2.9479	89.4060
AY+13	N/A	0.6153	2.6819	2.4912	92.8922
AY+14	N/A	0.6153	2.0665	2.0072	97.1286

			p
	Cumulative	Paid	Losses at
	Losses Paid	Each Year	Year End
Tax Year	(%)	(%)	(%)
AY+0	6.3899	6.3899	93.6101

24.0011

42,6970

58.0610

69.6653

75.6033

81.8786

87.8539

89.5207

94.3025

Cumulative

Losses Paid

(%)

2.1239

6.4831

15.5987

31.9062

45.0931

50.0751

60.9728

69.2138

72.8658

80.0005

N/A

N/A

N/A

AY+1

AY+2

AY+3

AY+4

AY+5

AY+6

AY+7

AY+8

AY+9

AY+10

Tax Year

AY+0

AY+1

AY+2

AY+3

AY+4

AY+5

AY+6

AY+7

AY+8

AY+9

AY+10

AY+11

**Medical Malpractice** — Claims-Made

Unpaid

75.9989

57,3030

41.9390

30.3347

24.3967

18.1214

12.1461

10.4793

5.6975

0.9157

Unpaid

Losses at

Year End

(%)

97.8761

93.5169

84.4013

68.0938

54.9069

49.9249

39.0272

30.7862

27.1342

19.9995

12.8648

5.7300

**Medical Malpractice** — Occurrence

Estimated Losses

17.6112

18.6959

15.3640

11.6043

5.9380

6.2753

5.9753

1.6668

4.7818

4.7818

Estimated

Losses

Paid

Each Year

(%)

2.1239

4.3592

9.1156

16.3075

13.1868

4.9821

10.8976

8.2411

3.6519

7.1347

7.1347

7.1347

Discounted

Unpaid Losses at

Year End

(%)

77.4322

63.9463

48.5345

35.6284

25.8187

21.2542

16.0687

10.8809

9.8176

5.4836

0.8894

Discounted

Unpaid

Losses at

Year End

(%)

72.4330

72.2909

67.2433

54.4883

44.1809

41.7024

32.9847

26.4791

24.3079

18.4208

12.1803

5.5655

Discount

**Factors** 

(%)

82.7178

84.1411

84.6980

84.9528

85.1128

87.1194

88.6725

89.5834

93.6862

96.2450

97.1286

Discount

**Factors** 

(%)

74.0048

77.3025

79.6709

80.0194

80.4650

83.5302

84.5171

86.0097

89.5840

92.1061

94.6798

97.1286

## **Miscellaneous Casualty**

Tax Year	Cumulative Losses Paid (%)	Estimated Losses Paid Each Year (%)	Unpaid Losses at Year End (%)	Discounted Unpaid Losses at Year End (%)	Discount Factors (%)
AY+0	77.6669	77.6669	22.3331	21.2118	94.9792
AY+1	94.0673	16.4004	5.9327	5.5993	94.3797
AY+2	N/A	2.9664	2.9664	2.8812	97.1286

## Multiple Peril Lines (Homeowners/Farmowners Multiple Peril, Commercial Multiple Peril, and Special Liability (Ocean Marine, Aircraft (All Perils), Boiler, and Machinery))

Tax Year	Cumulative Losses Paid (%)	Estimated Losses Paid Each Year (%)	Unpaid Losses at Year End (%)	Discounted Unpaid Losses at Year End (%)	Discount Factors (%)
AY+0	55.9587	55.9587	44.0413	39.2528	89.1272
AY+1	77.8939	21.9352	22.1061	19.0243	86.0589
AY+2	84.0083	6.1144	15.9917	13.8706	86.7360
AY+3	91.3188	7.3105	8.6812	7.1762	82.6633
AY+4	92.1670	0.8482	7.8330	6.7334	85.9627
AY+5	94.3838	2.2168	5.6162	4.8552	86.4488
AY+6	96.4959	2.1121	3.5041	2.9719	84.8124
AY+7	97.3670	0.8712	2.6330	2.2533	85.5817
AY+8	98.0034	0.6364	1.9966	1.7334	86.8153
AY+9	98.4059	0.4025	1.5941	1.4230	89.2642
AY+10	N/A	0.4025	1.1916	1.0940	91.8045
AY+11	N/A	0.4025	0.7892	0.7453	94.4346
AY+12	N/A	0.4025	0.3867	0.3756	97.1286

AY+12	N/A	0.4025	0.3867	0.3756	97.1286		
Other (Including Credit)							
Tax Year	Cumulative Losses Paid (%)	Estimated Losses Paid Each Year (%)	Unpaid Losses at Year End (%)	Discounted Unpaid Losses at Year End (%)	Discount Factors (%)		
AY+0	66.7418	66.7418	33.2582	31.4355	94.5195		
AY+1	89.2755	22.5337	10.7245	10.1217	94.3797		
AY+2	N/A	5.3622	5.3622	5.2083	97.1286		

	Cumulative
	Losses Paid
Tax Year	(%)

AY+0

AY+1

AY+2

AY+3

AY+4

AY+5

AY+6

AY+7

AY+8

AY+9

AY+10

Tax Year

AY+0

AY+1

AY+2

AY+3

AY+4

AY+5

AY+6

AY+7

AY+8

AY+9

AY+10

AY+11

AY+12

AY+13

AY+14

Cumulative	
Losses Paid	
(%)	
10.2440	
10.2440	

29.3763

44.4111

67.8197

73.4753

78.8604

83.5027

84.0676

85.2129

90.5992

Cumulative

Losses Paid

(%)

13.5751

26.3964

40.2725

55.4566

65.3309

74.0647

80.9090

84.3622

84.6163

86.7311

N/A

N/A

N/A

N/A

N/A

N/A

Each Year (%) 10.2440 19.1323

Estimated

Losses

Paid

15.0349

23.4086

5.6555

5.3852

4.6422

0.5649

1.1453

5.3863

5.3863

Estimated

Losses

Paid

Each Year

(%)

13.5751

12.8213

13.8761

15.1841

9.8742

8.7339

6.8442

3.4532

0.2542

2.1147

2.1147

2.1147

2.1147

2.1147

2.1147

(%)

89.7560
70.6237
55.5889
32.1803
26.5247

Unpaid

Losses at

Year End

21.1396

16.4973

15.9324

14.7871

9.4008

4.0145

Unpaid

Losses at

Year End

(%)

86.4249

73.6036

59.7275

44.5434

34.6691

25.9353

19.0910

15.6378

15.3837

13.2689

11.1542

9.0395

6.9247

4.8100

2.6953

Other Liability — Occurrence

Discounted

Unpaid

Losses at

Year End

(%)

74.4023

59.1686

47.2393

25.9731

21.7087

17.4669

13.7354

13.9779

13.6374

8.9102

3.8993

Discounted

Unpaid

Losses at

Year End

(%)

68.4370

59.3429

48.6171

35.9011

27.8890

20.5703

14.7580

12.0881

12.5517

11.1276

9.6180

8.0178

6.3216

4.5237

2.6179

Discount

Factors

(%)

82.8940

83.7800

84.9799

80.7112

81.8434

82.6265

83.2585

87.7327

92.2252

94.7808

97.1286

Discount

**Factors** 

(%)

79.1866

80.6249

81.3982

80.5981

80.4434

79.3140

77.3031

77.3006

81.5914

83.8621

86.2277

88.6981

91.2910

94.0479

97.1286

Other Liability — Claims-Made

# Private Passenger Auto Liability/Medical

	Cumulative Losses Paid	Estimated Losses Paid Each Year	Unpaid Losses at Year End	Discounted Unpaid Losses at Year End	Discount Factors
Tax Year	(%)	(%)	(%)	(%)	(%)
AY+0	37.9339	37.9339	62.0661	56.5092	91.0468
AY+1	67.7044	29.7705	32.2956	29.2492	90.5670
AY+2	81.5316	13.8272	18.4684	16.7681	90.7936
AY+3	89.8898	8.3583	10.1102	9.1689	90.6897
AY+4	94.6531	4.7633	5.3469	4.8149	90.0509
AY+5	97.1265	2.4734	2.8735	2.5573	88.9961
AY+6	98.4587	1.3322	1.5413	1.3392	86.8852
AY+7	98.9811	0.5224	1.0189	0.8817	86.5309
AY+8	99.2330	0.2519	0.7670	0.6752	88.0336
AY+9	99.4067	0.1737	0.5933	0.5369	90.4936
AY+10	N/A	0.1737	0.4196	0.3903	93.0125
AY+11	N/A	0.1737	0.2460	0.2349	95.5126
AY+12	N/A	0.1737	0.0723	0.0702	97.1286
		Products Liabili	ty — Claims-Made		
		Estimated		Discounted	
Tax Year	Cumulative Losses Paid (%)	Losses Paid Each Year (%)	Unpaid Losses at Year End (%)	Unpaid Losses at Year End (%)	Discount Factors (%)
rax rear	(70)	(70)	(70)	(70)	(70)
AY+0	4.9750	4.9750	95.0250	76.1308	80.1166
AY+1	15.1072	10.1322	84.8928	70.2670	82.7714
AY+2	30.9560	15.8488	69.0440	58.1656	84.2443
AY+3	38.2420	7.2860	61.7580	54.1541	87.6876
AY+4	68.6101	30.3681	31.3899	26.1375	83.2673
AY+5	78.5966	9.9865	21.4034	17.4241	81.4078
AY+6	88.3971	9.8005	11.6029	8.3793	72.2169
AY+7	93.2957	4.8986	6.7043	3.8386	57.2557
AY+8	88.3815	-4.9142	11.6185	9.1284	78.5676
AY+9	89.6105	1.2290	10.3895	8.4107	80.9542
AY+10	N/A	1.2290	9.1604	7.6500	83.5111
AY+11	N/A	1.2290	7.9314	6.8436	86.2851
AY+12	N/A	1.2290	6.7024	5.9888	89.3544
AY+13	N/A	1.2290	5.4733	5.0828	92.8653
AY+14	N/A	1.2290	4.2443	4.1224	97.1286

	Estimated		
	Losses	Unpaid	
Cumulative	Paid	Losses at	
Losses Paid	Fach Year	Year End	

Tax Year	(%)	(%)	(%)
AY+0	9.0653	9.0653	90.9347
AY+1	14.9035	5.8382	85.0965
AY+2	29.2591	14.3555	70.7409

63.8634

75.2266

78.2679

78.1898

81.8722

N/A

N/A

N/A

N/A

Cumulative

Losses Paid

(%)

27.1668

68.7008

70.0362

87.5338

90.2132

91.3751

94.3845

93.3293

N/A

N/A

N/A

N/A

N/A

AY+3

AY+4

AY+5

AY+6

AY+7

AY+8

AY+9

AY+10

AY + 11

AY+12

AY+13

Tax Year

AY+0

AY+1

AY+2

AY+3

AY+4

AY+5

AY+6

AY+7

AY+8

AY+9

AY+10

AY + 11

AY+12

45.6462 16.3871 57.5945 11.9483

6.2689 11.3632 3.0413

-0.0781 3.6825

3.6825

3.6825 3.6825

3.6825

Estimated

Losses

Paid

Each Year

(%)

27.1668

41.5340

1.3354

17.4976

2.6794

1.1619

3.0095

-1.0552

1.0387

1.0387

1.0387

1.0387

1.0387

Reinsurance A (Nonproportional Property)

**Products Liability - Occurrence** 

54.3538 42.4055 36.1366 24.7734 21.7321 21.8102 18.1278 14.4453 10.7628 7.0803 3.3979

Unpaid

Losses at

Year End

(%)

72.8332

31.2992

29.9638

12.4662

9.7868

8.6249

5.6155

6.6707

5.6320

4.5932

3.5545

2.5158

1.4771

43,3693 33.6700 29.2359 19.2910 17.3172 18.4367 15.7515 12.9053 9.8883 6.6902 3.3003

Discounted

Unpaid

Losses at

Year End

(%)

64.9403

26.0748

26.2645

9.8255

7.6564

6.9196

4.2363

5.5769

4.8421

4.0632

3.2375

2.3623

1.4346

Discounted Unpaid Losses at

Year End

(%)

69.4041

67.5575

56.8310

Discount

Factors

(%)

76.3230

79.3893

80.3369

79.7908

79.4000

80.9039

77.8696

79.6849

84.5322

86.8918

89.3391

91.8744

94.4902

97.1286

Discount

**Factors** 

(%)

89.1631

83.3084

87.6541

78.8169

78.2320

80.2275

75.4399

83.6030

85.9749

88.4598

91.0821

93.9007

97.1286

	Cumulative
	Losses Paid
Tax Year	(%)

6.6962

22.3944

32.6486

50.2234

53.5839

55.6838

63.6144

66.4211

N/A

N/A

N/A

N/A

N/A

Cumulative

Losses Paid

(%)

11.4622

44.5791

63.9134

65.6185

79.9778

88.9152

91.2490

94.7645

N/A

AY+0

AY+1

AY+2

AY+3

AY+4

AY+5

AY+6

AY+7

AY+8

AY+9

AY+10

AY+11

AY+12

Tax Year

AY+0

AY+1

AY+2

AY+3

AY+4

AY+5

AY+6

AY+7

AY+8

Each Year (%)6.6962 15.6982 10.2542 17.5748

3.3605

2.0999

7.9306

2.8066

2.8066

2.8066

2.8066

2.8066

2.8066

Estimated

Losses

Paid

Each Year

(%)

11.4622

33.1169

19.3343

1.7051

14.3593

8.9374

2.3338

3.5155

3.5155

Estimated Losses

Paid

(%) 93.3038 77.6056 67.3514 49.7766 46.4161 44.3162

36.3856

33.5789

30.7723

27.9656

25.1590

22.3524

19.5457

Unpaid

Losses at

Year End

(%)

88.5378

55.4209

36.0866

34.3815

20.0222

11.0848

8.7510

5.2355

1.7200

Reinsurance C (Financial Lines)

Unpaid

Losses at

Year End

Reinsurance B (Non-proportional Liability)

> (%) 69.3996 57.4013 50.2879 35.2109 33.8637 33.7335 27.5925 26.3584 25.0503 23.6637

> > 22.1939

20.6359

18.9845

Discounted

Unpaid

Losses at

Year End

(%)

77.3623

47.9081

30.8767

30.9737

18.0484

9.9297

8.1227

4.9906

1.6706

Discounted

Unpaid

Losses at

Year End

Discount

Factors (%)

87.3777

86.4441

85.5627

90.0885

90.1419

89.5793

92.8199

95.3224

97.1286

74.6651
70.7379
72.9568
76.1201
75.8336
78.4969
81.4054
84.6171
88.2146
92.3211
97.1286

Discount

Factors

(%)

74.3802

73.9654

# Special Property (Fire, Allied Lines, Inland Marine, Earthquake, Glass, Burglary and Theft)

Tax Year	Cumulative Losses Paid (%)	Estimated Losses Paid Each Year (%)	Unpaid Losses at Year End (%)	Discounted Unpaid Losses at Year End (%)	Discount Factors (%)
AY+0	57.4895	57.4895	42.5105	40.5227	95.3241
AY+1	90.5193	33.0297	9.4807	8.9479	94.3797
AY+2	N/A	4.7404	4.7404	4.6043	97.1286
		Workers' (	Compensation		
Tax Year	Cumulative Losses Paid (%)	Estimated Losses Paid Each Year (%)	Unpaid Losses at Year End (%)	Discounted Unpaid Losses at Year End (%)	Discount Factors (%)
AY+0	23.6461	23.6461	76.3539	62.7199	82.1437
AY+1	44.8166	21.1705	55.1834	44.6867	80.9786
AY+2	57.9652	13.1486	42.0348	33.8306	80.4824
AY+3	72.0542	14.0889	27.9458	21.3550	76.4156
AY+4	80.5542	8.5000	19.4458	13.8850	71.4034
AY+5	84.8876	4.3334	15.1124	10.2565	67.8684
AY+6	87.1173	2.2297	12.8827	8.5763	66.5723
AY+7	88.2647	1.1473	11.7353	7.9096	67.4000
AY+8	88.5404	0.2757	11.4596	8.1003	70.6858
AY+9	88.8062	0.2658	11.1938	8.3126	74.2613
AY+10	N/A	0.2658	10.9279	8.5377	78.1273
AY+11	N/A	0.2658	10.6621	8.7763	82.3127
AY+12	N/A	0.2658	10.3963	9.0291	86.8499
AY+13	N/A	0.2658	10.1304	9.2972	91.7750
AY+14	N/A	0.2658	9.8646	9.5813	97.1286
DRAFTING INF	ORMATION	the Office of the A	ssociate Chief Counsel	(202) 622–3477	(not a toll-free number).

The principal author of this revenue

procedure is Katherine A. Hossofsky of

the Office of the Associate Chief Counsel (Financial Institutions and Products). For further information regarding this revenue procedure, contact Ms. Hossofsky at

(202) 622–3477 (not a toll-free number).