



## Pennsylvania Compensation Rating Bureau

United Plaza Building • Suite 1500  
30 South 17th Street • Philadelphia, PA 19103-4007  
(215)568-2371 • FAX (215)564-4328 • www.pcrb.com



December 14, 2015

### **VIA SERFF**

The Honorable Teresa D. Miller  
Insurance Commissioner  
Commonwealth of Pennsylvania  
Insurance Department  
1311 Strawberry Square  
Harrisburg, PA 17120

**Attention: Michael McKenney, Actuarial Supervisor, Property & Casualty Bureau**

**RE: PCRB Filing No. 268 - Proposed Effective April 1, 2016  
Proposed Classification Procedure Changes and Retitled Classifications  
Manual Housekeeping Revisions to Sections 1 and 2**

Dear Commissioner Miller:

On behalf of the members of the Pennsylvania Compensation Rating Bureau (PCRB), we hereby submit the proposed filing for revisions to the PCRB Workers Compensation Manual of Rules, Classifications and Rating Values for Workers Compensation and for Employers Liability Insurance (the Basic Manual). These revisions are proposed to be effective 12:01 a.m., April 1, 2016 with respect to new and renewal policies having normal anniversary rating dates on or after that date.

This proposed effective date is intended to make the implementation of these changes concurrent with the PCRB's normal annual loss cost revision filing, which was filed separately on December 8, 2015 (PCRB Filing No. C-366). This coordination will consolidate necessary changes that our members and other constituents must make to policies, forms and systems so that they occur once annually.

A PCRB staff memorandum dated November 3, 2015 is included with this filing. That memorandum describes a variety of proposed changes to Manual language and the bases therefor. These changes were reviewed by the Actuarial and Classification & Rating Committees at their joint meeting held on December 1, 2015. The changes are proposed to be effective for new and renewal policies effective on or after April 1, 2016, in coordination with the related and proposed Loss Cost Filing No. C-366 with the same proposed effective date. There are three classification proposals which would have classification loss cost impact. The other proposed classification and manual changes have no loss cost impacts.

### **CLASSIFICATION AND MANUAL LANGUAGE REVISIONS**

The proposed changes are detailed in the memorandum noted above, but fall generally into the following categories:

- Classification proposed procedure change #1 – revised procedure proposing the deletion of Code 648 door installation Underwriting Guide entry for reassignment to either Code 651 or 652.
- Classification proposed procedure change #2 – revised guideline for assignment of Code 647, Insulation Work, N.O.C. The change brings in line the assignment criteria along the lines of other contracting codes that it be applicable to “all work to completion.”

The Honorable Teresa Miller  
Commonwealth of Pennsylvania  
December 3, 2015  
Page 2

- Classification proposed procedure change #3 – to adjust the classification assignment language for Code 759, Cable Television Operators. This change proposes to end an anomaly in the procedure by adopting the otherwise uniform procedure of classifying the contractors by the contractor's field of business.
- Retitled and editorial classification changes – Code 025 – Mining; Code 185 Temporary Food Sundries; and Code 447 Non-Ferrous Foundry.
- Additions, revisions and deletions of various Underwriting Guide entries, Manual Sections 1 and 2.
- Deletion of a total of eight underwriting guide entries from the Manual.

In light of the intended coordination of this filing with the PCRB's pending annual loss cost filing noted above, the PCRB respectfully requests a prompt review and approval of this filing toward the objective of its implementation, as proposed, on a new and renewal basis **effective April 1, 2016**. Toward that objective, the PCRB will be pleased to answer any questions you or Insurance Department staff may have.

Sincerely,



William V. Taylor  
President

WVT/jf

Enclosures:

PCRB Staff Memorandum of November 3, 2015: Proposed Manual Language Revisions to Sections 1, & 2 (Housekeeping)



## Pennsylvania Compensation Rating Bureau

United Plaza Building • Suite 1500  
30 South 17th Street • Philadelphia, PA 19103-4007  
(215)568-2371 • FAX (215)564-4328 • www.pcrb.com



TO: Pennsylvania Compensation Rating Bureau (PCRB) Classification and Rating Committee

FROM: David T. Rawson – Technical Director  
Classification and Field Operations Department

DATE: November 3, 2015

RE: Proposed Manual Language Revisions to Sections 1 & 2 (Housekeeping)

The proposals discussed below are intended to make the Manual language clearer and less ambiguous. The proposed revisions clarify existing classification procedures and update language defining certain classifications to align the verbiage used with that in other Manual provisions, and/or to recognize ongoing technological or industrial changes.

This memorandum will propose three revisions to classification procedure. Those proposals and any of the Manual language revision proposals herein will not impact any classification's proposed April 1, 2016 class rating values. The PCRB recommends that all of the Section 1 or 2 language revisions proposed herein become effective upon new and renewal policies of April 1, 2016 and later.

The following narrative will first discuss each of the proposed revisions to existing classification procedure. This memorandum will then go on to discuss the three classifications proposed to be retitled, next address the three proposed Section 1 revisions, and conclude by discussing the proposed Section 2 additions, changes and deletions respectively.

### PROPOSED REVISIONS TO CLASSIFICATION PROCEDURE

#### PROCEDURE REVISION PROPOSAL #1

**CLASSIFICATION(S) APPLICABLE TO DOOR INSTALLATION** - One of PCRB's proposed "Housekeeping" classification revisions that were a part of PCRB Filing No. 244 effective for new and renewal policies of April 1, 2012 and later involved the classification applicable to door installation. That revision saw the reclassification of metal door installation from Code 658, Iron Erection or Installation – ornamental or non-structural only, to Code 651, Carpentry – Commercial. PCRB now proposes to delete the Code 648, Carpentry – Installation of Cabinet Work, Underwriting Guide (Guide) entry "Door or Door Frame Erection – Wood," and to concurrently consolidate the assignment of all door installation except for overhead doors (whose installation will remain assignable to Code 675, officially entitled "Machinery or Equipment Erection or Repair") to Code 651 or to Code 652, Carpentry – Residential.

The proposed deletion of the Code 648 door installation Guide entry results from PCRB staff discussion of the aforementioned Code 648 Guide entry's scope. Staff's discussion revolved around how to distinguish the Code 648 door installation entry from the Code 651 and Code 652 door installation Guide entries.

Background research regarding Code 648 showed that Code 648 was approved by the Insurance Commissioner (Commissioner) to be a Pennsylvania classification effective for new and renewal policies of October 1, 1985 and later. Code 648 was created without a study of Codes 651 and 652. Code 648 was modeled upon the National Council on Compensation Insurance, Inc. (NCCI) Code 5437, Carpentry – Installation of Cabinet Work or Interior Trim based upon a close reading of NCCI's Scope for that class. In fact, NCCI's Code 5437 Scope continues to include the statement "The installation of interior doors by trim or finish carpenters is also included in Code 5437."

With the above NCCI reference to trim or finish carpenters in mind, this memo observes that PCRB proposed and the Commissioner approved revision to the scope of Code 648 in the “Housekeeping” component of PCRB Filing No. C - 363. Therein, staff proposed deletion of the Code 648 language stating that the class was “Not applicable to contractors who perform other carpentry operations at the same job or location,” which restricted the application of Code 648. Staff’s supporting argument for removal of the restriction set forth that PCRB surveys and test audits had shown that more and more of the work assigned to Code 648 can be, and is being, performed by general rather than specialized carpenters. PCRB continues to hold that this work is now commonly performed by general carpenters.

As in the aforementioned Filing No. C - 363’s Code 648 revision, staff cannot quantify the potential rating value impact to Code 648 from the proposed reassignment of wooden door installation from Code 648 to either Code 651 or to Code 652, each of which has a higher rating value than does Code 648. Staff has not performed a file-by-file review of Code 648, which means PCRB does not know how many Code 648 employers are principally to exclusively engaged in the installation of wooden doors or wood door frames. In the event that such a review is considered, the Committee should keep in mind that staff may only reassign the Code 648 historical experience of an employer whose Code 648 exposure is principally to exclusively engaged in wooden door installation to either Code 651 or to Code 652. PCRB cannot partition data reported to Code 648 between two or more classifications. If the employer performs a number of tasks assigned to Code 648 and wooden door installation is found to be one thereof, staff would leave the historical experience assigned to Code 648 and simply add Code 651 and/or Code 652 to the employer’s authorized classifications. In other words, PCRB does not know how many Code 648 employers may be impacted by this proposal or the potential rating value impact going forward to Code 648, Code 651 or to Code 652. Assuming approval of this proposal it will take five full years of data reflecting this revision that will not be available until PCRB makes its April 1, 2024 comprehensive loss cost filing (using Manual years 2016 through 2020 as a basis for determining classification relativities).

**PREMIUM IMPACT** – PCRB makes this proposal, as noted above, with the knowledge that the approved Code 651 and Code 652 rating values are higher than the approved Code 648 rating value. This means that if these proposals are approved, on a going forward basis as impacted Code 648 employers are identified, PCRB would treat such employers as being misclassified and implement class reassignments (the substitution of Code 651 and/or Code 652) pursuant to the Manual rules which dictate upon each employer’s first normal policy renewal at least sixty days after PCRB’s class decision letter.

## **PROCEDURE REVISION PROPOSAL #2**

**Code 647, INSULATION WORK, N. O. C.** – Staff proposes deletion of the language “The class applies when insulating work is performed as a separate operation not part of or incident to any other construction operation performed by the same contractor at the same job or location.” This change will permit the use of Code 647 for any insulation work performed by the employer, provided that separate staffs are involved or that separate payroll records for interchanging personnel have been maintained. In other words, staff proposes that going forward Code 647 be treated like the other 600 series construction classifications excepting only those few codes that are designated as being applicable to “all work to completion.” Staff review has shown that in addition to Code 647, the two classifications that will be most significantly impacted by the approval and implementation of this proposal will be Code 651 and Code 652.

Staff observes that the potential premium impact of the proposed language deletion on Code 647, Code 651 or Code 652 cannot presently be ascertained, as insurer records and PCRB data have not been partitioned in the fashion that will be allowed under the new language. Staff also observes that, assuming approval of this proposal for policies effective on a new and renewal basis of April 1, 2016 and later, five full Manual years of data reflecting the expanded application of Code 647 will not be available until PCRB makes its April 1, 2024 comprehensive loss cost revision (using Manual years 2016 through 2020 as a basis for determining classification relativities).

Code 647 was erected effective for new and renewal policies of June 1, 1985 and later, and was modeled upon the class scope and Manual language of NCCI's Code 5479, Insulation Work NOC & Drivers. NCCI and New York also have restrictive language like that presently in effect in Pennsylvania.

As noted above, PCRB Filing No. C - 363 proposed, and the Commissioner approved, removal of the restrictive use language then in Code 648. PCRB had adopted the restrictive use language upon the creation of Code 648, also effective for new and renewal policies of October 1, 1985 and later. In developing the proposal to delete the Code 648 restrictive use language, staff contacted NCCI and the independent Bureau state of New York to ask when such restrictive language had been adopted and the reasons supporting that adoption. Both NCCI and New York were able to discuss the "vintage" of their restrictive language (circa the 1920's) but neither rating organization was able to explain why it had been adopted. Both sources hypothesized that the restrictive language may have been adopted for data quality reasons.

PCRB holds that data quality was also likely the principal reason for having restrictive language regarding the application of Code 647. Staff observed in Filing No. C - 363, and also observes for purposes of this memorandum, that data quality is a universal concern. PCRB is aware of no obvious reason to take more than our usual level of care to safeguard the integrity of construction classes such as Code 648 and Code 647, respectively.

**PREMIUM IMPACT** – If this proposal is approved there will be no premium impact to businesses presently assigned to Code 647. Businesses presently assigned to Code 651 and/or Code 652 which are found upon review by PCRB to also be eligible for assignment to Code 647 will see either premium increases (files presently assigned only to Code 651 also being assigned to Code 647) or premium decreases (files presently assigned only to Code 652 being also assigned to Code 647) as a result of this proposal. Any indicated class assignments will be implemented pursuant to PCRB Manual rules.

**PROCEDURE REVISION PROPOSAL #3**

**Code 759, CABLE TELEVISION OPERATIONS**

Code 759 was proposed and approved by the Commissioner to become effective upon new and renewal policies of October 1, 1982 and later. Code 759 is the only PCRB classification that also contemplates contractors to the business assigned to the customer's (the FCC licensed cable television provider) applicable classification. This is opposite the basic philosophy of PCRB's uniform classification plan of classifying the employer by the employer's field of business. Staff proposes to end this anomaly by ending that procedure and adopting the otherwise uniform procedure of classifying the contractors by the contractor's field of business. The proposed language revision will see specialist contractors engaged in the installation, maintenance or repair of cable television lines or servicing a cable television customer classified to their applicable contractor's classification as provided for in PCRB's Manual. With one exception the approved April 1, 2015 loss cost for the potentially applicable contractor classification is lower in relation to the approved loss cost for the cable television operations classification:

Class	April 1, 2015 Loss Cost	Service Provided
617	\$2.95	Installing Underground Conduit & Cable in Or Along Streets
656	5.85	Stringing Cable From Pole-to-Pole
660	2.35	Installing Cable From The Street to the Customer's Structure
759	5.08	The Licensed Cable TV Provider

**PREMIUM IMPACT** – At this writing PCRB does not know how many cable television contractors are assigned to Code 759 or presently misclassified to the applicable 600 series classification. If this proposal is approved there will be no immediate premium impact to businesses presently assigned to Code 759. On a going forward basis in the course of normal file review as staff identifies a contractor assigned to

Code 759 that employer will be reassigned to the applicable 600 series classification in accordance with Manual rules.

#### **CLASSIFICATIONS TO BE RETITLED**

##### **Code 025: From - Mining – not coal To - Mining - Underground**

Code 025 is an original PCRB classification created concurrently with the PCRB's uniform classification plan effective new and renewal policies of December 31, 1922 and later. The class has always contemplated the underground mining of any mineral except coal. There are two purposes to the proposed re-titling of Code 025. The first is to give greater prominence to the class' scope. The second is to give greater prominence to the Coal Mine Compensation Rating Bureau of Pennsylvania's (CMCRBPA) role in pricing coal mining and processing workers' compensation exposures. For a number of years the sole reference to coal mining and processing or the CMCRBPA (aside from several underwriting Guide entries only found in the Manual's Section 2 alphabetical listing thereof) has been a brief reference to the CMCRBPA and a listing of their classifications at the end of the Section 2 "General Auditing & Classification Information" (Information). One may wonder how many Manual users know about those two pages of coal information because those pages are not listed in the Information's Index.

##### **Code 185: From - Temporary Food Sundries Mfg., N.O.C. Staff To - Temporary Products Mfg., N.O.C. Staff**

Effective for new and renewal policies of April 1, 2014 and later, PCRB proposed and the Commissioner approved, a revision in the title for Code 104 class from "Food Sundries Mfg., N.O.C.", to "Food Products Mfg., N.O.C." At that time, PCRB overlooked the fact that there was a one-to-one temporary staffing classification related to Code 104 and for which the class title also included "Food Sundries Mfg." That class is Code 185, which continues to be entitled "Employment Contractor – Temporary Food Sundries Mfg., N.O.C." PCRB now proposes to retitle Code 185 by substituting "Products" for "Sundries." Staff also proposes to make that same word substitution for each of Code 185's three Underwriting Guide entries.

##### **Code 447: From - Non-Ferrous Foundry To – Nonferrous Foundry**

Code 447, officially entitled "Non-Ferrous Foundry," is the only classification that is listed twice in Section 2 of PCRB's Manual. The first listing is on page A28 where Code 447 is grouped with the other foundry classifications. The second listing is on page A33 where Code 447 is listed in its numerical sequence. These two Code 447 listings have different spellings. The first entry's spelling is "Nonferrous" and the second entry's spelling is "Non-Ferrous." Staff found no harm in continuing to include both Code 447 Section 2 listings, but concluded that the Code 447 class title's spelling should be uniform.

Several dictionaries were accessed, each of which listed a number of words starting with "non." Those dictionaries all treated "non" as a separate syllable, and in no case was any word beginning with "non" hyphenated after those letters. The several dictionaries we used listed "nonferrous," but not "non-ferrous."

Staff observes that Code 447 has sixteen Guide entries. Half of those Guide entries presently include the word "nonferrous" and in each case use the "nonferrous" spelling.

Staff proposes to retitle Code 447 to "Nonferrous Foundry" and to consistently use that spelling in both Code 447 Guide listings.

**PREMIUM IMPACT:**

There is no premium impact to the proposals to retitle Code 025, Code 185, or Code 447. Any employer that is correctly classified to any of these three classifications will remain correctly classified regardless of how PCRB titles any of the three classifications. The reverse is also true, which means that if in a future file review an employer is found to be misclassified to Code 025, Code 185, or to Code 447 that employer will have been misclassified regardless of how PCRB has titled any of these three classifications.

**PROPOSED SECTION 1 REVISIONS**

Staff's ongoing review of the Manual recently identified three Section 1 Rule IV provisions that need clarification.

1. The first proposed clarification is to make b. (3) under Paragraph B. 3., "General Inclusions" consistent with (4) under Paragraph C. 3. b., entitled "Governing Classification." Each of these Rule IV provisions discusses how to classify an employer whose principal business is described by a standard exception classification, but b. (3) under Paragraph B. 3. does not provide guidance on how to classify personnel whose job duties are not contemplated by a standard exception classification. Such guidance is provided by (4) under Paragraph C. 3. b., which specifies that Code 971, officially entitled "Commercial Buildings" is to be assigned to persons whose job duties are not contemplated by a standard exception class. PCRB proposes to eliminate any potential confusion by amending b. (3) under Paragraph B. 3. to read the same as (4) under Paragraph C. 3. b. in that respect. This language is also being proposed as an additional "Operations Also Included" in Code 971's Section 2 class description.
2. The second proposed Rule IV clarification is to add coal mining to the listing of General Exclusions found in Paragraph B. 4. This proposal is another element of the proposed enhanced prominence of references to the CMCRBPA's role in the PCRB Manual discussed above.
3. The third and last proposed clarification is to Paragraph C. 8. entitled "Changing Classifications." This proposal results from PCRB's revisions to the "Appeals From Application of the Rating System Procedure" approved by the Commissioner to be effective upon new and renewal policies of October 1, 2015 and later. The approved revision removed the sole Manual reference to when an employer will become eligible for an application of the rating system (e.g., classification) pursuant to a PCRB filing with the Commissioner. Staff holds that provision should be retained in the Manual and we propose an addition to Paragraph C. 8. to accomplish that. Concurrent with this proposal staff also proposes to substitute PCRB for Bureau throughout Paragraph C. 8.

**PREMIUM IMPACT**

Only the first of the Section 1 proposals has the potential for premium impact. PCRB is unaware of any employer whose principal business is classified by a standard exception classification and for which any personnel of such a business whose job duties are not contemplated by a standard exception classification are not assigned to Code 971. In the event that ongoing staff file review identifies any such employer(s) that are not classified in such manner, staff will treat that employer or those employers as being misclassified. If the implementation of the correct classification assignment will increase the employer's premium, the correct classification assignment will be implemented effective the employer's first normal policy renewal at least sixty days from the date of PCRB's notice of misclassification.

**PROPOSED SECTION 2 REVISIONS**

**ADDITIONS**

All of the proposed additions to Section 2 are Guide entries applicable to ten classifications. This totals nineteen Guide additions including the one Code 652 addition cited above. Including Code 652 there are six classifications with a single proposed Guide addition.

Code 311 has nine proposed Guide additions. Code 311's present Section 2 class description includes a two sentence narrative and a listing (in table format) of seventeen wood products whose manufacture is contemplated by Code 311. This listing predates the November 1, 2007 reformatting of Section 2 that was proposed by PCRB Filing No. 227. The Commissioner's approval of the reformatting was announced by PCRB Circular No. 1536 issued August 29, 2007. Staff proposes to delete the table listing Code 311 products, and to add a Code 311 Guide entry for each listed product that does not already have a Guide entry.

Two of the three proposed Code 855, Lumber and/Building Material Dealer, additions (and the Section 2 revisions to Code 814, Dealer In Mobile, Self-Propelled Equipment and Code 855) publicize PCRB's procedure for classifying a business principally engaged in the rental or sale of non-mobile and self-propelled construction equipment.

## REVISIONS

Staff proposes to revise the Section 2 listings of thirty classifications. The proposed revisions may be broken down as shown below. Please keep in mind that a single classification may be impacted by more than one listed revision.

- Eight classifications, including Codes 025 and 759 discussed above, are proposed to have an "Operations Also Included" segment and/or an "Operations Not Included" segment added. Additional examples of this change include: Codes 050, 647 and 934.
- Another eight classifications are proposed for revision(s) to either their existing "Operations Also Included" segment and/or their "Operations Not Included" segment (e.g., Codes 461, 757, and 971).
- Fourteen classifications, including Codes 185 and 651 discussed above, are proposed to have revisions or clarifications to one or more selected existing Guide entries (e. g., 485, 660, 675, 815 and 894). Nine of the proposed Guide entry revisions are to Code 675 Guide entries.
- The Housekeeping portion of Bureau Filing No. C – 363 included a discussion of the decline in telegraph operations since the end of World War II. That Filing proposed and the Commissioner approved the deletion of "telegraph" or "telegraph operation" in portions of the Manual. Staff's re-search showed the telegram has been largely superseded by newer technologies. Staff now proposes to complete the removal of "telegraph" or "telegraph operation" from the Manual by the proposed revisions to the Code 485, Communications, Search, Detection or Signal Processing Equipment Mfg., Section 2 class description, a Code 485 Guide entry, from a Code 953 guide entry and the proposed deletion of the Code 757 Guide entry cited below.
- Staff had overlooked the need to revise the Section 2 class descriptions of Codes 960, 974 and 979 because of the deletion of the "Campus" definition proposed in Bureau filing No. 261 that was approved by the Commissioner to be effective upon new and renewal policies of April 1, 2015 and later.
- The scope of two classifications (Codes 857 and 885) are proposed for clarification regarding the classification applicable to businesses principally engaged in the wholesale distribution of tubes.
- In the General Auditing & Classification Information part of Section 2, staff proposes revision to the "Classification and Test Audit Inquiries" entry. "Test" is being deleted from the title, PCRB's preferred method of receiving such an inquiry and additional language for this entry is being clarified.

## DELETIONS – UNDERWRITING GUIDE ENTRIES

PCRB proposes the deletion of eight Guide entries. The deletions include the above discussed Code 648 Guide entry and the two Code 651 Guide entries.

The four additional proposed deletions include the following:

- The “Catsup Mfg.,” Guide entry is assigned to Code 113, Canning and Preserving. Background research shows that “Catsup” is simply a different spelling for “ketchup.” Staff’s research has also shown the product is the same regardless of which spelling is used and that “ketchup” has been more widely used for some time. Staff overlooked the “Catsup Mfg.” Guide entry when we proposed the reclassification of “Ketchup Mfg.,” from Code 113 to Code 104 as a part of Bureau Filing No. 261 because ketchup is a table sauce and Code 104 contemplates the making of all types of sauces. The Commissioner approved that proposal which became effective new and renewal policies of April 1, 2015 and later.
- A recent file review revealed the need to clarify regarding the scope of the Code 660 Guide entry for “Cell Tower Erection – Wiring the Cell Site.” That Guide entry was placed in the Manual to be a “backup” to an “Operations Not Included” entry for Codes 656 and 757. The clarifications to the scope exceeded the number of fields allocated by PCRB’s ACCESS Underwriting Guide and thus, the proposed Guide deletion. Please see the Code 656 and Code 757 “Operations Not Included” proposed revision to 3. d. and 2. d. respectively.
- The Code 675 Guide entry for “Crane Repair, Permanently Located – By Specialist Contractor” because the proposed revisions to other Code 675 Guide entries make this entry redundant.
- The Code 757 entry for “Telegraph Operation,” discussed in the fourth bullet point under “Revisions” above.
- The seventh and last Guide entry proposed for deletion is “Pony Rides” assigned to Code 969, Amusement – Outdoor. Recent staff discussion concluded that Guide entry was inappropriately assigned to Code 969, as all other horse-related businesses are assigned to Code 801, Stable. Also, staff could not recall having reviewed any business principally engaged in that activity.

DTR

SECTION 1

CHANGES

Rule IV, Paragraph B. 3. b.

b. Any operation..... separately classified only if:

No change to 1 & 2

3. If t[T]he principal business is described by classifications defined as Standard Exceptions, the payroll of all employees not specially included in the definition for such Standard Exceptions shall be separately classified to Code 971[a standard exception classification].

Rule IV, Paragraph B. 4. General Exclusions

Some operations in a business.....exclusions and are:

No change to Numbers 1 through 5

6. Please refer to the Coal Mine Compensation Rating Bureau of Pennsylvania ([www.cmcrbpa.com](http://www.cmcrbpa.com)) for the classification(s) applicable to the surface or underground mining of coal and/or the above ground operations necessary to prepare previously mined coal for distribution or sale by the mine operator or an independent coal preparation plant and/or coke burning and/or manufacturing.

Rule IV, Paragraph C. 8. “Changing Classifications”

- a. The PCRB[Bureau] is empowered to determine, revise or modify the classification(s) assigned to any individual insured. No written application by the carrier, agent of record or an insured to change an insurer’s authorized classification(s) shall be considered by the PCRB[Bureau] until the carrier has issued and filed a copy of its policy Information Page written in accordance with an insured’s authorized classification(s). The classification(s) shown in any policy shall be subject to correction or modification, or both, if the PCRB[Bureau] finds by survey or otherwise that the classification(s) shown on the policy are inappropriate to the insured. No written application to change the classification(s) for an insured on the grounds that the insured has been improperly classified shall be considered by the PCRB[Bureau] unless such written application is filed directly with the PCRB[Bureau] by the insured, agent of record or the carrier during the policy period with respect to which the application is made, or within twelve months after the termination thereof.
- b. (1) A change in an insured’s operations that results from a recent change in the insured’s operations (i. e., an operations change that has taken place during the current policy year or the policy year that has just expired) will be applied pro rata as of the date of the change in the insured’s operations, regardless of the premium impact to the insured. When a PCRB[Bureau] review discloses the insured’s recent operations change, the PCRB[Bureau] will make written notice to the carrier of record changing the insured’s authorized classification(s) for the current policy year and, if warranted, for the policy year that has just expired. When the carrier becomes aware of such recent operations change, the carrier shall make written application to the PCRB[Bureau] to change the insured’s authorized classification(s) during the current policy year and, if warranted, for the policy year that has just expired.  
(2) A correction of a.....after the termination thereof.  
(3) A correction of a misclassification which results in a premium increase shall be applied effective the employer’s first normal policy renewal at least sixty days subsequent to the date of the PCRB’s[Bureau’s] misclassification notice.
- c. Any correction of a.....application of this Rule.

- d. The reallocation of payroll by a carrier among an insured's authorized classifications or the PCRB[Bureau] requiring a carrier to reallocate payroll among an insured's authorized classifications or to report payroll under an insured's authorized classifications for the insured's current policy or for the insured's prior policy within twelve months after the termination thereof does not constitute a class change or correction.
- e. Any reclassification pursuant to a revision in classification procedure that PCRB has filed with and that has been approved by the Insurance Commissioner shall be effective only upon any insured's first normal policy anniversary date on or later than the effective date for the revision approved by the Insurance Commissioner.

## SECTION 2

### ADDITIONS

#### Underwriting Guide

##### To Code 104:

Noncarbonated Beverage Mfg., N.O.C.

##### To Code 311:

Architectural Woodwork Mfg.

Bulletin Board Mfg.

Display Case Mfg. - Wood

Kitchen Cabinet Mfg. – Wood

Library Cabinet Mfg. – Wood

Partition Mfg. – Wood

Restaurant Booth Mfg. – Wood

Store Counter Mfg. – Wood

Walk-In Refrigerator Mfg.

##### To Code 652:

Door Installation – Residential – All Types Except Overhead Doors

##### To Code 855:

Fence Dealer – All Types

Non-Mobile & Self-Propelled Construction Equipment – Rental Or Sale

Rental Or Sale Of Non-Mobile & Self-Propelled Construction Equipment

##### To Code 885:

Tube Or Pipe Merchant, Including Cutting, New Materials Only – All Types And Sizes

##### To Code 922:

Video Game Arcade – Mobile

##### To Code 934:

Automobile Body Accessories Dealer

##### To Code 969:

Paintball Game Playing Facilities – Outdoor

##### To Code 995:

Trash Transfer Station – Non-Municipal

CHANGES

**025 MINING – UNDERGROUND [- not coal]**

OPERATIONS ALSO INCLUDED:

1. The underground mining of any mineral except coal.
2. Includes all operations (i.e., milling or other mineral preparation) customarily done at mine site or as a part of the mining activity performed by the mine operator.

OPERATIONS NOT INCLUDED:

1. Please refer to the Coal Mine Compensation Rating Bureau of Pennsylvania ([www.cmcrbpa.com](http://www.cmcrbpa.com)) for the classification(s) applicable to the surface or underground mining of coal and/or the above ground operations necessary to prepare previously mined coal for distribution or sale by the mine operator or an independent coal preparation plant and/or coke burning and/or manufacturing.

[Includes underground mining.....part of the mining activity.]

**050 QUARRIES, N.O.C.** – [including drilling or.....cutting or polishing

This class includes.....granite, mica schist.]

OPERATIONS ALSO INCLUDED:

1. The quarrying or excavation of any mineral (except coal) not specifically assigned to either Code 051 or Code 055 respectively.
2. Includes all operations such as but not necessarily limited to drilling, stone crushing, cutting or polishing customarily done at a quarry or mineral excavation site or as part of the quarrying or excavation activity performed by the quarry or mineral excavation operator.

OPERATIONS NOT INCLUDED:

1. Assign Code 025 to the underground mining of any mineral except coal along with all operations (i.e., milling or other mineral preparation customarily done at the mine site or as a part of the mining activity performed by the mine operator).
2. Please refer to the Coal Mine Compensation Rating Bureau of Pennsylvania ([www.cmcrbpa.com](http://www.cmcrbpa.com)) for the classification(s) applicable to the surface or underground mining of coal and/or the above ground operations necessary to prepare previously mined coal for distribution or sale by the mine operator or an independent coal preparation plant and/or coke burning and/or manufacturing.

Underwriting Guide

Change to Code 104:

[Vegetables – ]TV Dinner Type Meals, Cooking, Packing And Freezing

**185 EMPLOYMENT CONTRACTOR – Temporary FOOD PRODUCTS[SUNDRIES]  
Mfg., N.O.C. Staff**

Applicable only to.....classifying temporary staff.

Underwriting Guide

Changes to Code 185:

Employment Contractor – Temporary Food Products[Sundries] Mfg., N.O.C. Staff.....

Food Products[Sundries] Mfg., N.O.C. – Temporary Staff

Temporary Food Products[Sundries] Mfg., N.O.C. Staff

**311 CABINET WORKS** – with power driven machinery

Applicable to a.....and require installation.

[Typical products.....Walk-In Refrigerators.]

**446 PRECISION MACHINED PARTS MFG., N. O. C.**

Applies to a business principally engaged in Precision Machined Parts Mfg., N. O. C. Such term will be defined as applying to a [machining] business machining single-piece parts for others where the plans or specifications require more than 50 percent of all machining operations performed by the employer will be held to a final tolerance of plus/minus .001 inches or closer (e .g., plus/minus .0005 inches) and where more than 50 percent of the single-piece machined parts made by the employer are not assigned to any other manufacturing classification.

A business principally.....business' overall machining.

**OPERATIONS NOT INCLUDED:**

No Change to Numbers 1 and 2

3. Assign the applicable manufacturing classification when the employer assembles of any single-piece machined parts into end-product components. Assembly operations include but are not limited to: welding, fastening, inserting, pressing, and the joining of springs, ball bearings, gears, or other parts or components to any other part or component.

**447 NONFERROUS METALS FOUNDRY**

When a foundry is.....to experience or retrospective rating.

Also includes secondary machining of nonferrous[non-ferrous] castings by the employer. There is no payroll division with Code 461.

**447 NONFERROUS[NON-FERROUS] METALS FOUNDRY**

When a foundry is.....to experience or retrospective rating.

Also includes secondary machining of nonferrous[non-ferrous] castings by the employer. There is no payroll division with Code 461.

**461 MACHINE SHOP**

Also includes the .....(e. g., Hydraulic jacks or lifts).

**OPERATIONS NOT INCLUDED:**

No change to Numbers 1 and 2

3. Separately rate[Assign] the installation, service or repair of industrial machinery, pumps or other products to Code 675 or to an alternate construction classification, if applicable [to separate staff engaged in the installation, service or repair of industrial machinery, pumps or other products whose manufacture is contemplated by Code 461].

**485 COMMUNICATIONS, SEARCH, DETECTION OR SIGNAL PROCESSING EQUIPMENT MFG.**

- Includes but is not limited to the manufacture of:
- (1) Telephone[or telegraph] equipment or apparatus
  - (2) No change
  - (3) No change

Underwriting Guide  
Change to Code 485:  
Telephone [Or Telegraph]Equipment Or Apparatus Mfg.

**647 INSULATION WORK, N. O.C.**

Includes the installation or application of acoustical or thermal insulating material in buildings or within building walls. [The class applies when insulating work is performed as a separate operation not part of or incidental to any other construction operation performed by the same contractor at the same job or location.]

OPERATIONS ALSO INCLUDED:

- 1. A Weatherization Program insulates the client's home, which may be a detached house, a twin, a row house or a mobile home. The clients are generally either elderly, on a fixed income or are low-income families. All of a weatherization program's tasks (e.g., fixing windows and/or doors, installing blown or vat insulation, putting in foam sealants, doing caulking or putting in weather stripping) are incidental to the efforts of preventing outside air from infiltrating the home and concurrently preventing warm or air-conditioned air from escaping the home's insulation.

OPERATIONS NOT INCLUDED:

- 1. Assign Code 651 to payroll developed in asbestos encapsulation or removal (not pipe insulation).
- 2. Assign Code 663 to pipe covering or insulation work including asbestos encapsulation or removal.

[WEATHERIZATION PROGRAMS – 647]

[The purpose of a.....in a weatherization program.]

**649 CEILING INSTALLATION** – suspended acoustical grid type. [Insulation work will be separately rated.]

**651 CARPENTRY – COMMERCIAL STRUCTURES**

OPERATIONS NOT INCLUDED:

- 1. Assign Code 675 to the installation of overhead doors.

Underwriting Guide  
Change to Code 651:  
Door Installation – All Types Except [Metal or Metal Covered, In Garages, Not] Overhead Doors

**652 CARPENTRY – RESIDENTIAL** Includes one or two.....or apartments.

OPERATIONS ALSO INCLUDED:

- 1. Assign Code 652 to the entire payroll of employees interchanging among trades at a specific job site.

**OPERATIONS NOT INCLUDED:**

1. Separately classify trades where there is no interchange of personnel at specific job sites.
2. Assign Code 675 to the installation of overhead doors.

[This classification shall.....be separately classified.]

**656 ELECTRIC or Telephone LINE CONSTRUCTION** by Contractors

Includes the setting.....stringing of lines.

**OPERATIONS NOT INCLUDED:**

No change to items 1. through 3c.

- d. Assign Code 660 to running a lateral line connecting the cell tower site to the land-line telephone network and/or installing low voltage wiring to the computer(s) or the fiber optic cable carrying the telephone signal to and from the cell site's base station call switching equipment.
- e. Assign Code 952 to the programming, service or repair [installation] of computerized telephone call switching equipment in the cell site's base station.

Underwriting Guide

Change to Code 660:

Telephone Cable Laying With Automatic Equipment[(Ditchwitch)] – Street to Building – By Specialist Contractor

Underwriting Guide

Change to Code 661:

Electric Cable Laying With Automatic Equipment[(Ditchwitch)] – Street [T]to Building – By Specialist Contractor

Underwriting Guide

Changes to Code 675:

Conveyor Or Conveyor Belt Installation[, By Contractor]

Crane Or Derrick Installation, Service Or Repair – Permanently-Sited

Elevator Erection, Service Or Repair

Escalator Installation, Service Or Repair[, By Contractor]

Installation of Hod Hoists[, Etc.]

Hoist Installation, Service Or Repair – Permanently-Sited

Industrial Crane Installation, Service Or Repair – Permanently-Sited

Machinery Erection, Service Or Repair[, Not By Manufacturer]

Textile Machinery Installation, Service Or Repair

**757 TELECOMMUNICATIONS COMPANY**

Applicable to FCC licensed businesses[telecommunications firms.] principally engaged in providing telephone[the] services [provided include]including but [are] not necessarily limited to: wireline, long distance, cellular radio paging or mobile services for customers for a fee.

**OPERATIONS ALSO INCLUDED:**

1. No change

**OPERATIONS NOT INCLUDED:**

No Change to items 1 through 2c.

- d. Assign Code 660 to running a lateral line connecting the cell tower site to the land-line telephone network and/or installing low voltage wiring to the computer(s) or the fiber optic cable carrying the telephone signal to and from the cell site's base station call switching equipment.
- e. Assign Code 952 to the programming, service or repair[installation] of computerized telephone call switching equipment in the cell site's base station.
- 3. Assign Code 759 to a business principally engaged in providing cable television and Internet services.

**759 CABLE TELEVISION OPERATIONS**

Applicable to FCC licensed businesses principally engaged in providing cable television and Internet services to subscribing customers.

OPERATIONS ALSO INCLUDED:

- 1. The erection or installation or system hook-up or service and/or repair or the operation of a cable television and Internet system by the cable and Internet provider.

OPERATIONS NOT INCLUDED:

- 1. Assign Code 936 to separately staffing broadcasting studios and/or separate crews engaged in the presentation and/or filming of news and events.
- 2. Separately classify contractors engaged in the construction or erection work or the hook-up or service of customers for a cable television or Internet provider as follows:
  - a. Assign Code 617 to payroll developed in installing conduit underground and running cable through the conduit.
  - b. Assign Code 656 to payroll developed in the stringing of cable from pole-to-pole.
  - c. Assign Code 660 to payroll developed in hooking up or servicing (including installing or replacing a lateral line from the pole to the customer's building and/or running cable in the customer's building.

[Applicable to contractors.....classified by Code 936].

**809 FUEL DISTRIBUTION – Retail or Wholesale**

For businesses principally engaged in the sale of prepared[processed] coal, fuel oil, liquefied petroleum (LP), gas (bottled gas or in bulk), or any combination of these lines.

OPERATIONS NOT INCLUDED:

No change to Numbers 1 through 4

- 5 Please refer to the Coal Mine Compensation Rating Bureau of Pennsylvania ([www.cmcrbpa.com](http://www.cmcrbpa.com)) for the classification(s) applicable to the surface or underground mining of coal and/or the above ground operations necessary to prepare previously mined coal for distribution or sale by the mine operator or an independent coal preparation plant.

**810 COAL TRUCKING**

Applies to payroll developed in truck delivery of unprepared coal and is applied to all those engaged in the hauling of unprepared coal except employers assigned to Coal Mine Compensation Rating Bureau Codes 1001, 1010, 1012, 1014, 1015, 1021 or[and] 1023.

If hauling of unprepared coal.....rate to such payroll.

**814 DEALER IN MOBILE, SELF-PROPELLED** factory, farm or construction **EQUIPMENT** – including parts department

**OPERATIONS NOT INCLUDED:**

1. Assign Code 819 to payroll developed by employees engaged in the sale of mobile, self-propelled factory, farm or construction equipment.
2. Assign Code 855 to a business principally engaged in the rental or sale of construction equipment that is not mobile and self-propelled.

[Payroll developed by.....or construction equipment.]

**815 AUTOMOBILE SERVICE CENTER** Or Garage [– including counter personnel and estimators]

Please see the “Automobile Dismantlers” entry in the General Auditing & Classification Information regarding how to classify a business whose operations include the dismantling of automobiles and/or other types of vehicles to recover usable/saleable used parts.

**OPERATIONS ALSO INCLUDED:**

1. Counter personnel and/or cost estimators for auto repair facilities waiting on customers, preparing job cost or sales estimators writing up orders and collecting payments for services rendered or merchandise purchased.

**OPERATIONS NOT INCLUDED:**

1. Assign Code 225 to tire recapping or retreading when performed by a separate crew of employees in a physically separate work area.
2. See the Code 934 Section 2 class description for how to classify a new auto parts store that also provides automobile repair services.
3. Please refer to the “Automobile Service/Gasoline Station” entry in the General Auditing & Classification Information for information on classifying such business enterprise.

[Tire recapping or.....as the dismantling.]

Underwriting Guide

Change to Code 815:

Automobile Dismantler – See General Auditing & Classification Information [815]

**855 LUMBER** and/or **BUILDING MATERIAL DEALER**

Applicable to establishments.....the lumber/building material dealer

**OPERATIONS ALSO INCLUDED:**

No change to Numbers 1 through 4.

4. A business principally engaged in the rental and/or sale of non-mobile and self-propelled construction equipment (e.g., temporary bridge sections, shoring equipment, air compressors).

**857 METAL SERVICE CENTER (Ferrous or Nonferrous Metals)**

Applicable to a business[insureds] principally engaged in the sale and distribution of new ferrous or nonferrous metal merchandise generally obtained from new metal producers such as steel mills or smelters, including but not necessarily limited to: beams, sheet stock in coils, bars, rods, rounds, channel iron, [tubes,] angles or plates. Such business[insured] may handle a broad variety of new metal merchandise or specialize in handling a single type.

The new metal merchandise received by the business[these insureds] is unloaded and stored. The new metal merchandise may be shipped “as is” to the customer or it may be cut, slit, sheeted, bent or burned into the size and shape required by the customer and delivered by truck or rail.

Specialists principally .....the gross receipts.

**885 PLUMBING SUPPLIES DEALER OR PIPE MERCHANT – Wholesale**

Applies to dealers principally engaged in the wholesale selling of plumbing supplies, tubes or pipe. The term plumbing supplies as used in this classification includes but is not necessarily limited to: water heaters, water pumps, kitchen/bathroom fixtures (i. e., sinks, faucets, toilets, bath tubs, shower stalls) fittings or valves. Also included is the selling of tubes or pipe of all types and sizes. Businesses principally engaged in the wholesale sale of heating, ventilating and/or air conditioning equipment, supplies or parts are further contemplated by this classification.

Underwriting Guide

Change to Code 885:

Pipe Or Tube Merchant, Including Cutting, New Materials Only, All Types And Sizes

Underwriting Guide

Change to Code 894:

School for Children With Intellectual or Developmental Disability[Developmentally-Delayed]

**934 AUTOMOBILE PARTS AND ACCESSORY STORE – Retail and/or Wholesale**

An auto parts store that also provides automobile repair services shall have payroll divided with Code 815 provided the following conditions are fulfilled: the new auto parts sales and the automobile repair services are conducted in physically separate work areas by separate employee crews and the majority of the new parts/accessories sold [by the auto part parts store] must be sold to others and are neither installed nor used by the insured for repair services. If both operations are conducted and these conditions are not met, then payroll developed in both the new auto parts sales and auto repair services shall be assigned to Code 815.

Please refer to the “Automobile Dismantlers” entry in the General Auditing and Classification Information for direction in classifying any business whose operations include the dismantler of automobiles or other types of vehicles to recover useable/saleable used parts.

**OPERATIONS NOT INCLUDED:**

1. Assign Code 461 to the machining of brake drums and other auto parts conducted in a physically separate work area and staffed by a separate employee crew.

[The machining of brake drums.....assigned to Code 461.]

Underwriting Guide

Change to Code 934:

Tire Dealer – Wholesale [- No Installation, Service Or Repair]

Underwriting Guide

Changes to Code 952:

Cell Tower Erection – Programming,[Installation] Service And/Or Service of Computerized Call Switching Equipment By Contractor

Telephone (Private Branch Exchange) Apparatus Programming, Service Or Repair[Installation] By Contractor

Underwriting Guide

Change to Code 953:

Telephone[Or Telegraph] Operator

**960 NURSING and CONVALESCENT HOME** – Long-Term Care.....  
.....are assignable to Code 974.

There shall be no payroll division between Code 960 and Codes 974 and 979 at a single location[/campus].

**971 COMMERCIAL BUILDINGS**

Applicable to owners, operators.....management firm’s staff.

*OPERATIONS ALSO INCLUDED:*

No change to Numbers 1 & 2.

2. If the principal business is described by classifications defined as Standard Exceptions, the payroll of all employees not specifically included in the definition for such Standard Exceptions shall be separately classified to Code 971.

*OPERATIONS NOT INCLUDED:*

No change to Numbers 1 through 4.

**974 RETIREMENT OR LIFE CARE COMMUNITY** – with less than .....  
..... are assignable to Code 974.

There shall be no payroll division between Code 974 and Codes 960 and 979 at a single location[/campus].

Underwriting Guide

Change to Code 976:

Daycare – Developmentally Or Intellectually[Mentally] Disabled, No Residential Facility Affiliation

**979 RESIDENTIAL FACILITY FOR THE ELDERLY – NON-MEDICAL** – all employees except.....activities of daily living.

There shall be no payroll division between Code 979 and Codes 960 and 974 at a single location[/campus].

DELETIONS

Underwriting Guide

Deletion From Code 113:

Catsup Mfg.

Underwriting Guide  
Deletion From Code 648  
Door Or Door Frame Erection – Wood

Underwriting Guide  
Deletions From Code 651:  
Hollow Metal Door Installation  
Metal Door Installation – All Types

Underwriting Guide  
Deletion From Code 660:  
Cell Tower Erection – Wiring the Cell Site

Underwriting Guide  
Deletion From Code 675:  
Crane Repair, Permanently Located, By Specialist Contractor

Underwriting Guide  
Deletion From Code 757:  
Telegraph Operation

Underwriting Guide  
Deletion From Code 969:  
Pony Rides

## SECTION 2 – GENERAL AUDITING & CLASSIFICATION INFORMATION

### CHANGES

#### CLASSIFICATION AND [TEST] AUDIT INQUIRIES

Written classification and audit inquiries may be submitted to the Classification & Field Operations Department of the Pennsylvania Compensation Rating Bureau (PCRB) in one of the following methods[:]. PCRB's preferred method is by means of PCRB's website ([www.pcrb.com](http://www.pcrb.com)) by clicking on "Classification" on the website's main menu and then clicking on "Classification Inquiries." PCRB will also accept written inquiries by means of facsimile or the USPS. [via facsimile, USPS, or via the PCRB's website ([www.pcrb.com](http://www.pcrb.com)). For the last (preferred) method please click on "Classification" on the website's main menu and then click on "Classification Inquiries."]

For the Classification & Field Operations Department of the PCRB to operate effectively, it is important that the PCRB have the full cooperation of every carrier, agent and employer in providing the essential information that the PCRB needs to make classification rulings and to otherwise be of service to you.

The information that the Classification & Field Operations Department needs to properly respond to inquiries from carriers, agents or employers on classification questions is:

- A complete listing of all Pennsylvania operating locations.
- The exact name (as shown in Item 1 of the policy) and address of the business in question.
- The Bureau file number (if available) of the business in question (see Rating and Underwriting Reference via the Application Login or "Classification inquiries").
- A full and accurate written description of the business in question, including any available audits, loss control reports and/or insurance application information.

- Reason why a change in classification is being requested, i.e., has a substantial change in the employer's operations recently occurred?
- The name, title and telephone number of a management representative whom a PCRB field representative can contact to schedule an appointment with the employer (in the event that a field survey is necessary).
- Employer's website address.

[If a carrier or an agent is requesting a classification review in conjunction with a policy audit, the audit worksheets for the policy(ies) in question should accompany the request and, if applicable, the name(s) and a detailed job description of the employee(s) whose payroll allocation is being questioned. Please note the importance of this item since considerable time would be saved by the PCRB not having to ask for this information by return correspondence. Also note it is not the PCRB's role to become involved in every dispute involving the allocation of a particular employee's payroll to a given classification. Allocations of payroll are made by the carrier. Since the PCRB did not perform the audit, the PCRB does not normally have the relevant facts on which to base an opinion or render a decision. Issues/disputes of this kind should initially be referred to the carrier's regional audit manager for resolution.]

The information that the Field Operations Department needs to properly respond to disputes concerning payroll allocation on a final audit is:

- A request in writing from the insured or the insured's agent of record outlining the nature of the dispute.
- A complete and accurate description of the business operations during the policy term in dispute and if available a copy of the final audit as issued by the carrier.
- A complete listing of all employees being disputed including the names of each employee, a description of the duties of the employees during the policy term of the audit dispute and an explanation why the duties of the employees do not support the carrier's assignment.

If should be noted that it is not the PCRB's role to become involved in every dispute involving the allocation of a particular employee's payroll to a given classification. Allocations of payroll are made by the carrier and should be explained by the carrier to the insured. Since the PCRB did not perform the audit, the PCRB does not normally have the relevant facts on which to base an opinion or render a decision. Issues/disputes of this kind should initially be referred to the carrier's regional audit manager for resolution

Upon receipt of the written inquiry the PCRB will determine whether the information presented is sufficient to determine the employer's applicable classification. In those cases where the information provided is insufficient, the PCRB will usually schedule the employer for a field survey/special audit or issue a "Description of Operations Questionnaire." Following the field survey/special audit or receipt of the completed questionnaire, the PCRB will issue a written ruling on the matter that will be communicated to authorized parties. These decisions are subject to further review as delineated in the "Appeals from Application of the Rating System Procedure" – Section 1, Rule XVI.

**With respect to telephone requests, an official binding PCRB decision on classification/audit matters cannot be provided over the telephone.** However, the PCRB will offer opinions as requested. To that end a carrier, agent or employer who telephones the PCRB on a classification/audit question should:

- Identify himself/herself and indicate the firm he/she represents;
- Give the name, address and PCRB file number (if available) of the employer in question;
- Be knowledgeable of the facts surrounding the situation and prepared to provide specific responses to any questions asked.

Please remember the PCRB is in a position to reply only to an employer [relative to its account], the authorized agent or carrier-of-record or another representative of the employer relative to the employer's account (providing the PCRB has received a signed, recently-dated letter on the employer's letterhead authorizing the representative to act on the employer's behalf in the matter at issue).