

DATE: October 10, 2019
TO: All Surplus Lines Agencies
FROM: Marie E. Rudert, Executive Director
SUBJECT: Who is Responsible for the Filing? – Reminder

This is a reminder as to who is responsible for the surplus lines regulatory filings when two or more surplus lines licensees are involved in the transaction.

To assist you in complying with [40 P.S. § 991.1617](#), you must look at the functions that the individuals involved in the transaction play. If the producing broker in the transaction holds a surplus lines license but is not functioning as such in the transaction and that placement is made by a separate individual holding a surplus lines license, you could conclude that there is only one surplus lines licensee involved in the transaction as there is only one functioning as such.

For additional guidance, see our previous [“Who is Responsible for the Filing” bulletin of April 8, 2010](#).

MER/ds