

777 Bay Street, Suite 2400 T: 416 863 1750 P.O. Box 121 M5G 2C8

F: 416 868 0894 Toronto, Ontario E: mail@facilityassociation.com

TO: MEMBERS OF THE FACILITY ASSOCIATION

ATTENTION: CHIEF EXECUTIVE OFFICER

ALBERTA RISK SHARING POOL PROJECT MANAGER

BULLETIN NO.: F19 – 036

DATE: MAY 30, 2019

SUBJECT: ALBERTA RISK SHARING POOLS

- APRIL 2019 OPERATIONAL REPORT

A copy of this bulletin should be provided to your Chief Financial Officer and Appointed Actuary.

Please be advised that the April 2019 Alberta Risk Sharing Pools Operational Reports are now available on the Facility Association (FA) Portal at https://portal.facilityassociation.com.

Alberta Grid RSP - Summary of Financial Results

The calendar year-to-date Operating Result is -\$0.6 million and the incurred loss ratio to the end of 4 months is 68.0%, as summarized in the table below.

AB-G RSP Summary of Financial Results (for month and year-to-date)

	April	April	Year to date	Year to Date
Amounts in \$000s	2019	2018	Apr 2019	Apr 2018
Premium Written	18,131	13,305	53,611	43,636
Premium Earned	13,884	13,282	53,674	52,809
Incurred Losses	12,387	12,090	36,518	59,655
Underwriting & Admin Expense	5,609	4,104	17,775	18,626
Operating Result	(4,112)	(2,912)	(619)	(25,472)
Ratios:				
Loss ratio - Prior Accident Years	(4.8%)	(5.9%)	(27.2%)	15.4%
- Current Accident Year	94.0%	96.9%	95.2%	97.6%
Total	89.2%	91.0%	68.0%	113.0%
Underwriting & Admin Expense	40.4%	30.9%	33.1%	35.3%
Combined Operating Ratio	129.6%	121.9%	101.1%	148.3%

rounding differences may occur

These results are discussed in some detail in the "Current Month Results" section. For additional

numeric detail, please refer to Exhibit 1 "Summary of Operations for Calendar Year 2019 for Risk Sharing Pool - Alberta Grid" attached to this bulletin.

Updated Projection to Year-end 2019

The projected calendar year Operating Result to December 2019 is -\$35.3 million and the estimated combined operating ratio to December 2019 is 119.5%, as summarized in the table below. This updated projection to the end of the year has not changed significantly from the projection provided last month (see the second and third columns in the table).

AB-G RSP Summary of **Projected Year-end** Financial Results (current month's projection, prior month's projection, and Outlook posted last fall)

AB Grid RSP 2019 Yr-end Projection Amounts in \$000s	Current (Apr 2019)	Prior Mth (Mar 2019)	Change	Final 2019 Outlook*	
Premium Written	199,291	199,428	(137)	158,031	
Premium Earned	180,970	180,980	(10)	158,085	
Incurred Losses	150,752	150,913	(161)	144,374	
Underwriting & Admin Expense	65,474	65,565	(91)	51,933	
Net Result from Operations	(35,256)	(35,498)	242	(38,222)	
Ratios:					
Loss ratio - Prior Accident Years	(9.9%)	(9.7%)	(0.2%)	(3.1%)	
- Current Accident Year	93.2%	93.1%	0.1%	94.4%	
Total	83.3%	83.4%	(0.1%)	91.3%	
Underwriting & Admin Expense	in Expense 36.2% 36		0.0%	32.9%	
Combined Operating Ratio	119.5%		(0.1%)	124.2%	

rounding differences may occur

*as posted to FA's website Oct. 18, 2018

Current Month Results

The Alberta Grid Risk Sharing Pool produced a -\$4.1 million Operating Result in the month of April 2019, a deterioration of \$1.2 million compared with the same month last year. This deterioration is composed of a \$0.1 million deterioration associated with the \$0.6 million increase in earned premium (at a combined ratio of 121.9%), with the remaining \$1.1 million deterioration stemming from the overall increase in the combined ratio (from 121.9% to 129.6% applied to \$13.9 million in earned premium).

This month's results moved the year-to-date combined operating ratio from 91.3% at the end of 3 months to 101.1% at the end of 4 months. The 9.8 percentage point increase is composed of a 7.8 percentage point increase in the Prior Accident Years loss ratio, and a 2.5 percentage point increase in the expense ratio, offset by a 0.5 percentage point decrease in the Current Accident Year loss ratio.

Variances from Projections

The table at the top of the next page provides a summary of key components of the operating

results compared to the estimates projected last month.

AB-G RSP Summary of Actual vs Projected variances

April 2019	Actual	Projection	Difference	Difference %
Written Premium	18,131	18,268	(137)	(0.7%)
Earned Premium	13,884	14,168	(284)	(2.0%)
Reported Losses				
Paid Losses	10,137	9,154	983	10.7%
Paid Expenses	436	789	(353)	(44.7%)
Change in Outstanding Losses	(3,266)	1,399	(4,665)	(333.5%)
Total Reported Losses	7,307	11,342	(4,035)	(35.6%)
Change in IBNR Provision*	5,080	1,369	3,711	
Change in Premium Deficiency (DPAC)*	(115)	(111)	(4)	

(Amounts in \$000's) rounding differences may occur

Each month, management reviews the variance between reported premium activity and claims activity (actual reported claims payments and changes in case reserves) and the associated actuarial projections. The projection process involves many assumptions including claims reporting patterns. Actual reporting patterns vary from month-to-month, sometimes considerably. Although variances from our projections are expected, management investigates variances beyond set thresholds and responds as appropriate.

For the month of April 2019, reported losses were \$4.0 million lower than projected. The Current Accident Year reported a favourable variance of \$2.0 million, and the Prior Accident Years reported a favourable variance of \$2.0 million. Of the Prior Accident Years, 2018 had the largest variance in reported losses at \$1.5 million favourable, followed by Accident Year 2014 at \$1.2 million favourable. No other single Prior Accident Year had a variance in excess of \$1.0 million.

The variances for claims activity were beyond the set thresholds for some specific individual Prior Accident Years for the month. Management investigated claims activity and is satisfied that the variances are appropriately accounted for in our current booking process. All other variances were within the set thresholds for the month.

Booking IBNR

The IBNR booking process this month allowed the nominal IBNR (i.e. before the impact of discounting and changes in provisions for adverse deviation) to vary from projected in order to offset the Prior Accident Years and Current Accident Year variances from projected, including the impact of earned premium variances (as IBNR is based on loss ratios). This is consistent with management's investigation into reported claims variances, concluding they were random and not necessarily indicative of a trend. IBNR is discussed in more detail in the <u>Alberta Grid RSP April 2019 Operational Report – Actuarial Highlights</u>.

^{*}Detailed information is included in Alberta Grid RSP April 2019 Operational Report - Actuarial Highlights.

Effect of Quarterly Valuation

The April 2019 Alberta Grid Risk Sharing Pool Operational Report does not reflect the results of an updated valuation (the most recent valuation is as at December 31, 2018). The actuarial valuation will be updated next as at March 31, 2019 and we anticipate that the results will be reflected in the May 2019 Operational Report.

Alberta Non-Grid RSP - Summary of Financial Results

The calendar year-to-date Operating Result is -\$9.2 million and the incurred loss ratio to the end of 4 months is 87.5%, as summarized in the table below.

AB-N RSP Summary of Financial Results (for month and year-to-date)

	April	April	Year to date	Year to Date	
Amounts in \$000s	2019	2018	Apr 2019	Apr 2018	
Premium Written	9,521	9,819	39,036	32,141	
Premium Earned	9,230	8,148	38,234	32,253	
Incurred Losses	10,224	8,961	33,423	29,152	
Underwriting & Admin Expense	3,154	3,320	14,028	11,520	
Operating Result	(4,148)	(4,133)	(9,217)	(8,419)	
Ratios:					
Loss ratio - Prior Accident Years	(8.8%)	(3.6%)	(28.4%)	(24.3%)	
- Current Accident Year	119.6%	113.5%	115.9%	114.7%	
Total	110.8%	109.9%	87.5%	90.4%	
Underwriting & Admin Expense	34.2%	40.7%	36.7%	35.7%	
Combined Operating Ratio	145.0%	150.6%	124.2%	126.1%	

rounding differences may occur

These results are discussed in some detail in the "Current Month Results" section. For additional numeric details, please refer to Exhibit 2 "Summary of Operations for Calendar Year 2019 for Risk Sharing Pool - Alberta Non-Grid" attached to this bulletin.

Updated Projection to Year-end 2019

The projected calendar year Operating Result to December 2019 is -\$53.2 million and the estimated combined operating ratio to December 2019 is 143.0%, as summarized in the table at the top of the next page. This updated projection to the end of the year has improved by \$1.5 million from the projection provided last month (see the second and third columns in the table). This improvement is driven by a \$3.4 million decrease in the projected written premium for the year.

AB-N RSP Summary of **Projected Year-end** Financial Results (current month's projection, prior month's projection, and Outlook posted last fall)

AB Non-Grid RSP 2019 Yr-end Proj.	Current Prior Mth			Final 2019	
Amounts in \$000s	(Apr 2019)	(Mar 2019)	Change	Outlook*	
Premium Written	137,884	141,244	(3,360)	141,592	
Premium Earned	124,097	126,856	(2,759)	124,625	
Incurred Losses	128,243	131,236	(2,993)	137,538	
Underwriting & Admin Expense	49,084	50,301	(1,218)	50,104	
Net Result from Operations	(53,230)	(54,681)	1,452	(63,017)	
Ratios:					
Loss ratio - Prior Accident Years	(10.1%)	(9.5%)	(0.6%)	(2.6%)	
- Current Accident Year	113.5%	113.0%	0.5%	113.0%	
Total	103.4%	103.5%	(0.1%)	110.4%	
Underwriting & Admin Expense	39.6%	39.7%	(0.1%)	40.2%	
Combined Operating Ratio	143.0%	143.2%	(0.2%)	150.6%	

rounding differences may occur

*as posted to FA's website Oct. 18, 2018

Current month results

The Alberta Non-Grid Risk Sharing Pool produced a -\$4.1 million Operating Result in the month of April 2019, an insignificant change from the same month last year.

This month's results moved the year-to-date combined operating ratio from 117.5% at the end of 3 months to 124.2% at the end of 4 months. The 6.7 percentage point increase is composed of a 6.3 percentage point increase in the Prior Accident Years loss ratio, coupled with a 1.2 percentage point increase in the Current Accident Year loss ratio, offset by a 0.8 percentage point decrease in the expense ratio.

Variances from Projections

The table at the top of the next page provides a summary of key components of the operating results as compared to the estimates projected last month.

AB-N RSP Summary of Actual vs Proje	e ctea variances
-------------------------------------	-------------------------

April 2019	Actual	Projection	Difference	Difference %
Written Premium	9,521	12,881	(3,360)	(26.1%)
Earned Premium	9,230	10,113	(883)	(8.7%)
Reported Losses				
Paid Losses	6,801	7,449	(648)	(8.7%)
Paid Expenses	201	342	(141)	(41.2%)
Change in Outstanding Losses	(1,909)	448	(2,357)	(526.1%)
Total Reported Losses	5,093	8,239	(3,146)	(38.2%)
Change in IBNR Provision*	5,131	2,929	2,202	
Change in Premium Deficiency (DPAC)*	102	490	(388)	

(Amounts in \$000's) rounding differences may occur

As discussed in relation to the Alberta Grid RSP, each month management reviews the variance between reported premium activity and claims activity (actual reported claims payments and changes in case reserves) and the associated actuarial projections. The projection process involves many assumptions including claims reporting patterns. Actual reporting patterns vary from month-to-month, sometimes considerably. Although variances from our projections are expected, management investigates variances beyond set thresholds and responds as appropriate.

For the month of April 2019, reported losses were \$3.1 million lower than projected. The Current Accident Year had a \$1.4 million favourable variance in reported losses, and the Prior Accident Years had an approximately \$1.7 million favourable variance. Of the Prior Accident Years, 2018 had the largest variance in reported losses at \$1.6 million favourable. No other single Prior Accident Year had a reported loss variance in excess of \$1.0 million.

Booking IBNR

The IBNR booking process this month allowed the nominal IBNR (i.e. before the impact of discounting and changes in provisions for adverse deviation) to vary from projected in order to offset the Prior Accident Years and Current Accident Year variances from projected, including the impact of earned premium variances (as IBNR is based on loss ratios). This is consistent with management's investigation into reported claims variances, concluding they were random and not necessarily indicative of a trend. IBNR is discussed in more detail in the <u>Alberta Non-Grid RSP April 2019 Operational Report – Actuarial Highlights.</u>

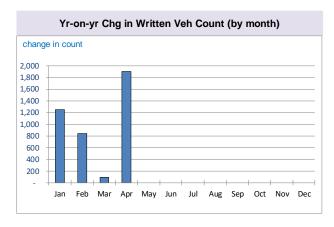
Effect of Quarterly Valuation

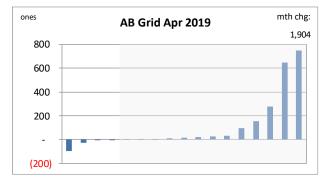
The April 2019 Alberta Non-Grid Risk Sharing Pool Operational Report does not reflect the results of an updated valuation (the most recent valuation is as at December 31, 2018). The actuarial valuation will be updated next as at March 31, 2019 and we anticipate that the results will be reflected in the May 2019 Operational Report.

^{*}Detailed information is included in Alberta Non-Grid RSP April 2019 Operational Report - Actuarial Highlights.

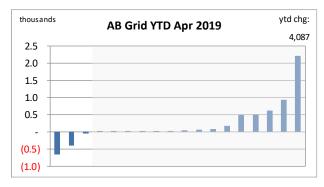
Management Comments

Alberta Grid





for 72% of the total transfer decrease for these "decliner" members. Of the 13 member company groups transferring more vehicles, 2 member company groups accounted for 68% of the total transfer increases for these "grower" members.



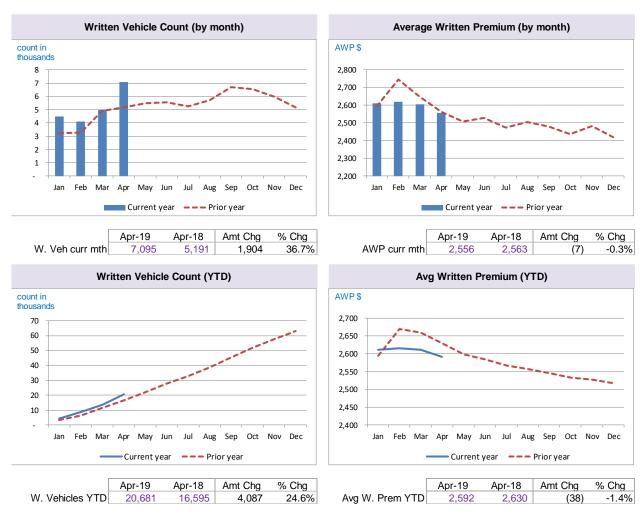
The chart on the left shows the year-on-year change in the vehicles transferred to the Alberta Grid RSP by month, with April showing an increase of 1,904 vehicles. Our projection last month (in part based on previous projections provided by select member company groups) was for an increase of 1,805 vehicles, indicating a variance of 99 vehicles from the actual transfers. This variance was mainly due to one member company group transferring a greater number of vehicles to the RSP in April than projected.

The chart on the left shows the overall change in the month, broken down by member company group changes (each blue bar represents the change for a single member company group), sorted by magnitude of change. Four member company groups transferred fewer vehicles to the RSP this month compared with a year ago, while thirteen transferred more. Of the 4 member company groups transferring fewer vehicles, 1 member company group accounted

The chart on the left presents the same of change.

information as the previous chart, but on a yearto-date basis. That is, it shows the overall change in transfer counts year-to-date, broken down by member company group changes (each blue bar represents the change for a single member company group), sorted by magnitude

April's vehicle count transfers to the RSP represent a 36.7% increase from April 2018, and counts were up 24.6% year-to-date. Average written premium was down 0.3% in April 2019 compared with the same month in 2018, and down 1.4% year-to-date (see charts at the top of the next page).

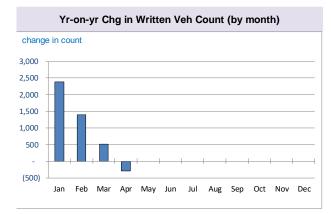


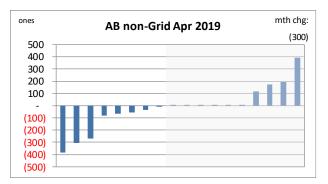
As a result of the movements in transfer vehicle counts and average written premium, the transferred premium was up 36.3% for the month compared with the 37.3% <u>in</u>crease we projected last month, and was up 22.9% year-to-date (see charts immediately below).



Alberta Non-Grid

For the Alberta Non-Grid RSP, the transfer limit is 4.0% of Non-Grid exposures written in the prior year at the member company group level (that is, within a group under common management or ownership, a single member can transfer the entire transfer limit for the group). System programming prevents member groups from exceeding their transfer limits during a calendar year. However, member groups can transfer their entire limit for a given year at any time throughout the year including, for example, the last day of that year. **Our current projection has the 2019 vehicle count up 17.2% from 2018**, being 3.3% of the 2017 industry private passenger vehicle count (excluding farmers) and industry farmers private passenger vehicle count (as we don't have an industry count yet for 2018, we continue to use the 2017 count as a proxy). There is the potential for the transferred vehicle count to change dramatically and quickly if member companies choose to take full advantage of their transfer limits.

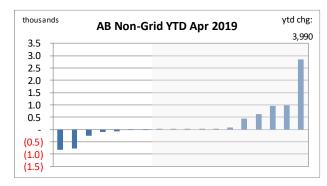




The chart on the left shows the year-on-year change in the vehicles transferred to the Alberta Non-Grid RSP by month, with April showing a decrease of 300 vehicles. Our projection last month (in part based on previous projections provided by select member company groups) was for an increase of 1,706 vehicles, indicating a variance of 2,006 vehicles from the actual transfers. This variance was mainly due to three member company groups transferring a lower number of vehicles to the RSP in April than projected.

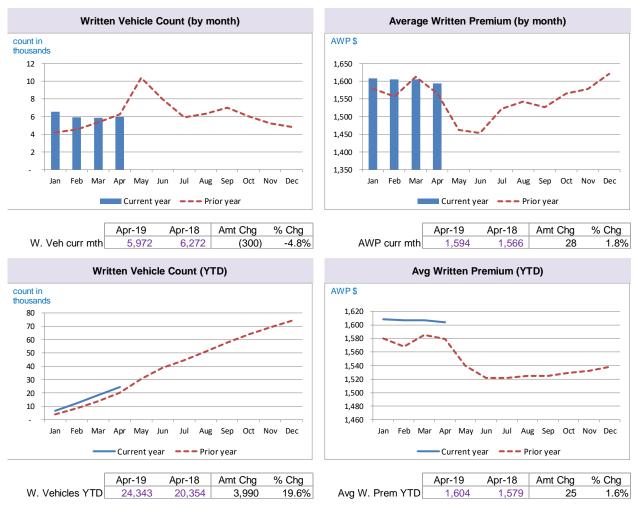
The chart on the left shows the overall change in the **month**, broken down by member company group changes (each blue bar represents the change for a single member company group), sorted by magnitude of change. Eight member company groups transferred fewer vehicles to the RSP this month compared to a year ago, while ten transferred more. Of the 8 member company groups transferring fewer vehicles, 3 member company groups accounted for 80% of

the total transfer decrease for these "decliner" members. Of the 10 member company groups transferring more vehicles, 4 member company groups accounted for 97% of the total transfers increase for these "grower" members.



The chart on the left presents the same information as the previous chart, but on a **year-to-date** basis. That is, it shows the overall change in transfer counts year-to-date, broken down by member company group changes (each blue bar represents the change for a single member company group), sorted by magnitude of change.

April's vehicle count transfers to the RSP represent a 4.8% <u>decrease</u> from April 2018, but counts were up 19.6% year-to-date. Average written premium was up 1.8% in April 2019 compared with the same month in 2018, and were up 1.6% year-to-date (see charts immediately below).



As a result of the movements in transfer vehicle counts and average written premium, the transferred premium was down 3.0% for the month compared with the 31.2% <u>increase</u> we projected last month, but was up 21.4% year-to-date (see charts at the top of the next page).

Bulletin F19–036 Alberta Risk Sharing Pools – April 2019 Operational Reports



Should you require any further information, please call Norm Seeney, Vice President, Finance and Member Services at (416) 644-4914.

Saskia Matheson President & CEO

Related Links:

Alberta Grid RSP:

Alberta Grid RSP April 2019 Operational Report - Actuarial Highlights

Alberta Non-Grid RSP:

Alberta Non-Grid RSP April 2019 Operational Report - Actuarial Highlights

SUMMARY OF OPERATIONS - CALENDAR YEAR 2019

Risk Sharing Pool - Alberta (Grid)
Operating Results for the 4 Months Ended April 30, 2019 (Discounted basis)

Source: Monthly Operational Report

(thousands of dollars)

	January	February	March	April	CY2019 YTD	CY2019 12 MONTHS Updated Projection	CY2018 12 MONTHS Actual
Underwriting Revenue:							
Net Premiums Written	\$11,700	\$10,771	\$13,009	\$18,131	\$53,611	\$199,291	\$158,547
Decrease (Increase) in Unearned Premiums	1,935	1,482	893	(4,247)	63	(18,321)	3,021
Net Premiums Earned	\$13,635	\$12,253	\$13,902	\$13,884	\$53,674	\$180,970	\$161,568
Claims Incurred:							
Prior Accident Years:							
Undiscounted	(\$336)	(\$453)	(\$15,477)	(\$157)	(\$16,423)	(\$16,423)	\$555
Effect of Discounting	779	(315)	1,873	(506)	\$1,831	(1,536)	(8,142)
Discounted	\$443	(\$768)	(\$13,604)	(\$663)	(\$14,592)	(\$17,959)	(\$7,587)
Current Accident Year:							
Undiscounted	\$12,482	\$11,366	\$12,301	\$12,485	\$48,634	\$161,671	\$146,295
Effect of Discounting	593	484	834	565	\$2,476	7,040	4,993
Discounted	\$13,075	\$11,850	\$13,135	\$13,050	\$51,110	\$168,711	\$151,288
Claims Incurred	\$13,518	\$11,082	(\$469)	\$12,387	\$36,518	\$150,752	\$143,701
Underwriting Expenses:							
Expense Allowance	\$3,644	\$3,360	\$4,049	\$5,645	\$16,698	\$62,006	\$47,116
Change in UPDR/DPAC:	40,011	40,000	+ 1,0 10	40,010	. ,	*,	*,
Undiscounted	213	178	(66)	(328)	(3)	412	3,348
Effect of Discounting	(76)	(61)	703	213	779	1,806	(1,135)
Discounted	137	117	637	(115)	776	2,218	2,213
Underwriting Expenses	\$3,781	\$3,477	\$4,686	\$5,530	\$17,474	64,224	\$49,329
Net Underwriting Gain (Loss)	(\$3,664)	(\$2,306)	\$9,685	(\$4,033)	(\$318)	(\$34,006)	(\$31,462)
5	(40,00.)	(42,000)	40,000	(\$.,555)	(40.0)	(40.,000)	(40.,.02)
Administrative Expenses	\$69	\$92	\$61	\$79	\$301	\$1,250	\$1,039
Operating Result	(\$3,733)	(\$2,398)	\$9,624	(\$4,112)	(\$619)	(\$35,256)	(\$32,501)
Ratios:							
Claims & Expenses Incurred (Earned)							
Prior Accident Years	3.2%	-6.3%	-97.9%	-4.8%	-27.2%	-9.9%	-4.7%
Current Accident Year	95.9%	96.7%	94.5%	94.0%	95.2%	93.2%	93.6%
All Accident Years Combined (Earned)	99.1%	90.4%	-3.4%	89.2%	68.0%	83.3%	88.9%
Underwriting & Administrative Expenses (Earned)	28.2%	29.1%	34.1%	40.4%	33.1%	36.2%	31.2%
Combined Operating Ratio	127.3%	119.5%	30.7%	129.6%	101.1%	119.5%	120.1%

Note: Amounts shown above do not reflect costs incurred directly by member companies e.g. income and premium taxes, health levies, association dues, cost of capital as a result of their compulsory participation in Facility Association and investment income earned on Facilty Association premium dollars invested directly by members.

Rounding difference may apply

EXHIBIT 1

SUMMARY OF OPERATIONS - CALENDAR YEAR 2019

Risk Sharing Pool - Alberta (Non-Grid)
Operating Results for the 4 Months Ended April 30, 2019 (Discounted basis)
Source: Monthly Operational Report
(thousands of dollars)

EXHIBIT 2

	January	February	March	April	CY2019 YTD	CY2019 12 MONTHS Updated Projection	CY2018 12 MONTHS Actual
Underwriting Revenue:							
Net Premiums Written	\$10,569	\$9,549	\$9,397	\$9,521	\$39,036	\$137,884	\$113,977
Decrease (Increase) in Unearned Premiums	(729)	(477)	695	(291)	(802)	(13,787)	(7,273)
Net Premiums Earned	\$9,840	\$9,072	\$10,092	\$9,230	\$38,234	\$124,097	\$106,704
Claims Incurred:							
Prior Accident Years:							
Undiscounted	(\$92)	(\$79)	(\$10,395)	(\$587)	(\$11,153)	(\$11,153)	(\$14,506)
Effect of Discounting	(301)	(372)	1,181	(229)	279	(1,434)	(5,786)
Discounted	(\$393)	(\$451)	(\$9,214)	(\$816)	(\$10,874)	(\$12,587)	(\$20,292)
Current Accident Year:	· ·	· · · · · · · · · · · · · · · · · · ·					
Undiscounted	\$10,631	\$9,795	\$11,262	\$10,623	\$42,311	\$135,473	\$117,039
Effect of Discounting	548	409	612	417	1,986	5,357	3,698
Discounted	\$11,179	\$10,204	\$11,874	\$11,040	\$44,297	\$140,830	120,737
Claims Incurred	\$10,786	\$9,753	\$2,660	\$10,224	\$33,423	\$128,243	\$100,445
Underwriting Expenses:							
Expense Allowance	\$3,286	\$2,970	\$2,924	\$2,973	\$12,153	\$42,895	\$33,858
Change in UPDR/DPAC:							
Undiscounted	65	66	787	81	999	3,402	1,227
Effect of Discounting	38	27	488	21	574	1,433	(63)
Discounted	103	93	1,275	102	1,573	4,835	1,164
Underwriting Expenses	\$3,389	\$3,063	\$4,199	\$3,075	\$13,726	\$47,730	\$35,022
Net Underwriting Gain (Loss)	(\$4,335)	(\$3,744)	\$3,233	(\$4,069)	(\$8,915)	(\$51,876)	(\$28,763)
Administrative Expenses	\$69	\$92	\$62	\$79	\$302	\$1,354	\$1,054
Operating Result	(\$4,404)	(\$3,836)	\$3,171	(\$4,148)	(\$9,217)	(\$53,230)	(\$29,817)
Ratios:							
Claims & Expenses Incurred (Earned)							
Prior Accident Years	-4.0%	-5.0%	-91.3%	-8.8%	-28.4%	-10.1%	-19.0%
Current Accident Year	113.6%	112.5%	117.7%	119.6%	115.9%	113.5%	113.2%
All Accident Years Combined	109.6%	107.5%	26.4%	110.8%	87.5%	103.4%	94.2%
Underwriting & Administrative Expenses (Earned)	35.1%	34.8%	42.2%	34.2%	36.7%	39.6%	33.8%
Combined Operating Ratio	144.7%	142.3%	68.6%	145.0%	124.2%	143.0%	128.0%

Note: Amounts shown above do not reflect costs incurred directly by member companies e.g. income and premium taxes, health levies, association dues, cost of capital as a result of their compulsory participation in Facility Association and investment income earned on Facility Association premium dollars invested directly by members.

Rounding difference may apply