



**MARYLAND**  
AUTO INSURANCE

December 16, 2025

Marie Grant, Insurance Commissioner  
200 St. Paul Place, Suite 2700  
Baltimore, MD 21202

Dear Commissioner Grant,

Thank you for the opportunity to provide additional comments to the HB1098 Affordability Workgroup Report. I am honored to have served on the Workgroup and appreciative of the collaborative nature of the work towards the common goal of providing affordable rates and access for Maryland drivers.

MAIF believes it is important to elaborate on the following two points: 1) Affordability in the residual market is a critical factor and should be included in any ongoing studies or reporting recommended by the Workgroup; and, 2) Any low-cost alternative program or approach should be administered by Maryland's residual market mechanism, MAIF, as they are in other states.

MAIF has cited the FIO definition of affordability for several years. In fact, MAIF's current affordability index is influenced by the FIO definition. However, the FIO definition does not consider residual market premium rates. It is MAIF's opinion that this omission should not be continued in reporting Maryland statistics. Residual markets, like MAIF, are often over-represented in urban communities where pricing sensitivity may be even more pronounced.

MAIF is Maryland's residual market mechanism and a statutorily created unit of State government, having administered Maryland's residual market for more than 50 years. As such, MAIF has the infrastructure, talent (approximately 200 jobs headquartered in Baltimore City), and experience to administer and implement any low-cost alternative programs. Low-cost alternative programs are often administered by the State's residual market mechanism. MAIF strongly believes that it is the appropriate, if not intended, entity to administer any alternative approach to Maryland's residual market.

Thank you for your work and that of all Workgroup members in taking on the complex topic of auto insurance affordability in Maryland. I am happy to meet and further our discussion on this important matter.

Sincerely,

**Al Redmer Jr.**  
Maryland Auto Insurance | Executive Director  
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