

July 25, 2025

Director of Regulatory Affairs
The Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, Maryland 21202

Re: Comments on Proposed Amendments to COMAR 31.15.11.06 – Credit History Use Disclosure

To Whom it May Concern,

On behalf of the National Association of Mutual Insurance Companies (NAMIC), thank you for the opportunity to comment on the Maryland Insurance Administration's (MIA) proposed amendments to COMAR 31.15.11.06 regarding credit history use disclosures in private passenger motor vehicle insurance.

NAMIC is opposed to the proposed changes and respectfully urges the MIA to reconsider moving forward with them. Carriers already have processes in place to comply with existing disclosure requirements, and it remains unclear what specific consumer protection issue the proposed changes are intended to address.

In particular, the requirement that the disclosure appear in a "prominent" location is subjective and introduces compliance uncertainty. Furthermore, the operational impact of implementing these changes would be significant. Updating systems and revising the agent quoting process requires extensive coding and retraining. This would impose a substantial burden on carriers, particularly in the absence of a clearly identified problem the changes are intended to address.

If the MIA does proceed with the regulation, we encourage you to consider alternative language that would provide carriers more flexibility. Specifically, replacing the requirement that the disclosure appear "on the application form" with "or other documentation provided to the applicant" would help avoid costly application changes while still ensuring applicants receive the required information.

Thank you for your time and for considering our input. NAMIC welcomes the opportunity to discuss this further or provide any additional information that may be helpful.

Sincerely,



Gina Rotunno
Regional Vice President
Mid-Atlantic