

November 24, 2025

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

Sent via email to: InsuranceRegReview.mia@maryland.gov

RE: Draft Regulations 31.08.13 and 31.08.19

APCIA appreciates the opportunity to provide comments to the Maryland Insurance Administration (MIA) on draft regulation 31.08.13 Application of a Percentage Deductible in Case of a Hurricane and 31.08.19 Filing of Underwriting Standards. . The American Property Casualty Insurance Association (APCIA) is a national trade organization whose members write approximately 67.4% of the private passenger auto market and 66.1% of the homeowners insurance market in Maryland. We support a modern, effective system of insurance regulation, one that fosters a vibrant, competitive insurance market that protects insurers and guards against unnecessary system costs. It is in this spirit that we offer the following comments and concerns.

We did not receive any member feedback regarding the proposed change to Chapter 13 Application of a Percentage Deductible in the Case of a Hurricane to require notice to the commissioner “prior to implementing” (previously “within 10 days of”) a withdrawal of an underwriting standard that requires a percentage deductible over 5%.

As for the proposed Chapter 19 Filing of Underwriting Standards, however, our members have substantial concerns, regarding unnecessarily restricting insurers’ ability to respond to changing market conditions, confidentiality, and ultimately the impact on competition in Maryland’s insurance markets.

Overall, we question whether adoption of the proposed regulations would represent a step backwards for Maryland and whether their adoption would have adverse effects on insurance consumers. Several member companies noted that Maryland previously required the filing of underwriting standards but did away with that expansive requirement while retaining the ability to request submission of understating standards, and they expressed dismay at what seemed to be a regressive step in the wrong direction.

The most significant concern expressed by a number of APCIA members is that requiring filing of all automobile and homeowners underwriting guidelines will add further complexity to an already complicated filing process in Maryland that could cause delays in responding to changing market conditions. This could result in hampering competition by making it more difficult for insurers to make necessary changes. The end result of dampening competitive forces would be adverse to consumers.

Another significant concern expressed by many member insurers is whether filed underwriting guidelines would be considered proprietary information and therefore be kept confidential. Again, the nature of the concern is about the impact on the competitive forces in the marketplace and

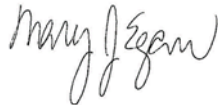
specifically whether failure to consider filed underwriting guidelines confidential could potentially limit competition by providing competitors knowledge of each company's appetite, ultimately adversely affecting consumers.

In addition to the noted concerns, member companies sought clarification on a number of points, including the following:

- Would the underwriting standards be sent one time or each time a filing is made?
- If underwriting standards are amended, should only the amendment be sent, or the full underwriting standards with amendment highlighted?
- Would the filing of underwriting standards be for new business and renewals or just new business?
- Would the new requirement change the MIA stance that the insurer must write any risk for which it has an approved rate?

Thank you for considering our comments and suggestions. Please let us know if your review of them raises any questions or points of clarification. We look forward to continuing to work with you on this matter of importance to our members and their policyholders.

Sincerely,



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