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November 24, 2025

Via email: [InsuranceRegReview.mia@maryland.gov](mailto:InsuranceRegReview.mia@maryland.gov)

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

Re: Public Comment on Proposed COMAR 31.08.19

Dear Director of Regulatory Affairs,

The People's Insurance Counsel Division of the Office of the Attorney General (Division) submits the following comments on the Maryland Insurance Administration Commissioner's proposed draft regulation related to homeowners filing of underwriting standards and thanks the Commission and staff for their efforts and careful consideration of stakeholder input.<sup>1</sup> Pursuant to MD Code, State Government, § 6-306(a)(1) the Division shall evaluate homeowner's insurance matters pending before the Commissioner to determine whether the interests of insurance consumers are affected. In that role, the Division has advocated for the Commissioner to exercise their discretion under Insurance Article Section 27-501(h), Annotated Code of Maryland to require insurers to provide current underwriting standards and to provide amendments on a regular basis.

The Division respectfully submits this comment based on the Commissioner's draft proposed regulation COMAR 31.08.19. The Maryland Insurance Administration has proposed the regulation under its authority pursuant to Insurance Article, Section 27-501 (Unfair Trade Practices and Other Prohibited Practices, Subtitle Discrimination, Section Discrimination in Underwriting). The Division supports the Commissioner's proposed regulation.

This proposed regulation if adopted would apply to all property and casualty insurers

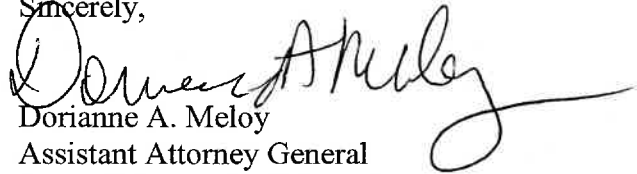
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<sup>1</sup> The PICD offers these comments in the division's advocacy role; the comments do not constitute the Attorney General's consideration of the regulations "for approval as to legality" under Md. Code Ann., State Gov't ("SG") §10-107.

authorized to write homeowner's insurance policies in Maryland. The regulation defines homeowner's insurance, which includes renter's insurance. The proposed requirement that the homeowner's insurers submit their underwriting standards filings via the System for Electronic Rates and Forms Filing provides for an efficient receipt and review of the filings. The proposed regulation COMAR 31.09.19 will allow for a timely review of the insurer's underwriting standards to ensure they are compliant with Maryland laws. These requirements will benefit insurance consumers ensuring that the underwriting standards by homeowner's insurers are not unfairly discriminatory.

The Division thanks the Commissioner and staff for consideration of our comments in support of the draft proposed regulation.

Sincerely,

A handwritten signature in black ink, appearing to read "Dorianne A. Meloy", with a long, sweeping horizontal line extending to the right.

Dorianne A. Meloy  
Assistant Attorney General  
People's Insurance Counsel