



November 24, 2025

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

Re: Regulation 31.08.19 – Filing of Underwriting Standards

To Whom it May Concern:

Thank you for the opportunity for Insurance Services Office, Inc. (ISO) to provide comments on draft Regulation 31.08.19 Filing of Underwriting Standards being considered by the Maryland Insurance Administration.

For you to best understand our perspective, please note that ISO provides information, including statistics, underwriting and claims information, actuarial analyses, policy language, and consulting and technical services in connection with multiple lines of property/casualty insurance, as well as information about specific properties. Our customers include insurers and reinsurers, as well as agents, brokers, self-insureds, risk managers, financial services firms, regulators, and various government agencies. After reviewing the proposed regulation, we have certain concerns regarding the following definition, and potential applicability of the related requirements with respect to commercial auto policies:

**Chapter 19 Filing of Underwriting Standards .03 Definitions:**

Chapter 19 Filing of Underwriting Standards - .03 Definitions (3) defines Private passenger motor vehicle insurance to mean “insurance subject to the requirements of Title 19, Subtitle 5 of the Insurance Article of the Annotated Code of Maryland.” We note that there is no statutory definition of “private passenger motor vehicle insurance” in Title 19, Subtitle 5. We also note that the undefined term “private passenger motor vehicle insurance” is referenced in some, but not all, of the statutes within Title 19, Subtitle 5. For instance, § 19–505 references “a motor vehicle liability insurance policy” and does not reference “private passenger motor vehicle insurance.”

The definition in the draft regulation references the requirements of Title 19, Subtitle 5 without qualification with respect to commercial policies that may be subject to certain statutes within Subtitle 5, thereby resulting in some ambiguity as to whether this may apply to a commercial insurance policy. To address this, we would suggest adding the following:

Private passenger motor vehicle insurance means insurance subject to the requirements of Title 19, Subtitle 5 of the Insurance Article of the Annotated Code of Maryland, other than commercial insurance.

As an alternative, please also consider:



Private passenger motor vehicle insurance means personal private passenger insurance policies subject to the requirements of Title 19, Subtitle 5 of the Insurance Article of the Annotated Code of Maryland.

Additionally, private passenger auto insurance is defined in Maryland Code of Regulations Title 31, Subtitle 01, § 31.01.02.03(23) as:

- (a) [...] liability and physical damage insurance that covers a vehicle driven for personal use.
- (b) "Private passenger auto insurance" includes automobiles, motorcycles, and recreational vehicles.

We would like to point out the inconsistency that the draft regulation is suggesting use of a different definition for private passenger auto insurance.

We would also like to note there is a duplicate in the definitions section after (5) "Underwriting Standards."

**Chapter 19 Filing of Underwriting Standards .02 Applicability:**

We also suggest the following change to the Applicability section:

This chapter applies to all property and casualty insurers authorized to write personal private passenger motor vehicle insurance policies in Maryland.

Again, thank you for the opportunity to share our comments with you regarding proposed amendments. Please feel free to contact me should you require additional information concerning ISO's position relative to these matters.

Sincerely,

A handwritten signature in black ink that reads 'Jessica Cleary' in a cursive script.

Jessica Cleary