



Kathryn Callahan -MDInsurance- <kathryn.callahan1@maryland.gov>

Notice Requirements for Premium Increases Based on Factors Measured through a Telematics Program

Matt Overturf <mooverturf@namic.org>

Mon, Nov 4, 2024 at 8:32 PM

To: "kathryn.callahan1@maryland.gov" <kathryn.callahan1@maryland.gov>

Cc: [REDACTED] William Fawcett -MDInsurance- <william.fawcett@maryland.gov>

Hi Kathryn,

Thank you for the opportunity to review and provide comments to the MIA's proposed bulletin regarding notice requirements for premium increases based on a telematics program. I shared the proposed bulletin with my members and received some comments and feedback to offer:

- NAMIC has concerns with the requirement to specify the individual driving components of the score that led to the increase. As drafted there is concern that the bulletin would expand existing statutory requirements in § 27-614 of the Insurance Article.
- The factors in the notice should be limited to those that attribute to an increase, not all factors measured by a telematics program.
- Specify what an insurer is required to provide in a protest hearing and how long data needs to be retained. NAMIC suggests limiting the data requested to the policy term or a maximum of one year. Many insurers do not maintain telematics data indefinitely so providing clear guidance as to what needs to be retained and for how long is needed.
- Finally, NAMIC requests the MIA provide insurers with an appropriate timeframe to provide updated filings and implement systems changes to comply with the expectations set forth in the Bulletin.

Thank you again for the opportunity to provide feedback. Please let me know if you have any questions.

Thanks,

Matt Overturf

Assistant Vice President – State Affairs, Ohio Valley

c:937.935.0432 | mooverturf@namic.org



3601 Vincennes Road | Indianapolis, Indiana 46268 | www.namic.org