

November 24, 2025

Maryland Insurance Administration  
200 St. Paul Street, #2700  
Baltimore, MD 21202

**Re: Clarification of Requirements for Insurers' Use of Telematics Programs**

On behalf of the National Association of Mutual Insurance Companies, thank you for the opportunity to comment on the Proposed Bulletin regarding insurers' use of telematics programs. We commend the Administration's efforts to provide clarity and consistency in this area. As one of the nation's largest property/casualty trade associations, we have a strong interest in ensuring Maryland's telematics framework remains transparent, predictable, and fair, supporting both insurers and policyholders.

It is important to emphasize that all telematics programs in Maryland are voluntary - both the insurer and policyholder must agree to participate. When policyholders choose to enroll, they are informed of the nature of the data collected and how it may be used. Because of this voluntary structure, we encourage the Administration to maintain clarity around what constitutes a telematics program and avoid broadening that definition in ways that do not reflect the legislative intent behind §27-614.

Specifically, we believe the treatment of mileage within the draft Bulletin warrants further clarification. Although "distance driven" may be one metric used in telematics programs, the draft does not clearly differentiate between purely odometer-based mileage factors and programs that remotely and electronically measure driving behaviors such as speed, braking, acceleration, or time of day. Pure mileage-based rating does not raise the same privacy or behavioral-monitoring concerns as a full telematics program, and we recommend the Bulletin explicitly distinguish the two.

This would also harmonize the Bulletin with the statutory requirement for notices of premium increase, which applies to premiums determined through a "program that measures the operation of an insured vehicle." That statutory phrase appears intended to describe behavioral telematics, not standalone mileage factors. Providing this clarification would prevent over-notification and reduce confusion among policyholders.

The requirement to provide "all relevant data" in a protest should more clearly define what counts as relevant and how long it must be retained. Without clear limits, insurers may need to store and reproduce unnecessary data, creating privacy concerns and operational burdens. We also urge the Administration to weigh the administrative and cost impacts of the proposed appeals and data-challenge processes. Broad appeal requirements and excessive reporting could increase insurer burdens, raise premiums, and undermine the simplicity that makes telematics

programs effective. If the system becomes too difficult to operate, participation may drop, reducing the safety and pricing benefits of these voluntary programs. Over-regulation could ultimately discourage participation and limit consumer choice.

We urge the Administration to clarify distinctions between mileage-only and behavioral telematics programs, define required notice content, and address data retention, protest, and appeals processes with attention to administrative costs. And finally, the Bulletin must allow sufficient time for implementation so insurers can update systems and operations without disruption.

Thank you for your consideration of these comments. We appreciate the opportunity to provide input and look forward to continued collaboration with the Maryland Insurance Administration.

Sincerely,

*Gina Rotunno*

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Regional Vice-President,  
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