

This represents an extraordinary burden on insurers, in particular smaller carriers for whom the development of necessary applications would represent an investment of significant resources. Also, as previously suggested, it is entirely likely that, in a good faith effort to provide data hereunder, different carriers will use different assumptions to capture data not previously captured.

ADDITIONAL INFORMATION

Question 1

Is this question asked in the context of how credit information is used? Or is it intended more generally?

Question 3

Is it an acceptable answer to this question for insurers to cite the relevant state law provisions governing the provision of exceptions to the use of insurance scoring for extraordinary life circumstances?

Question 4

Does the question seek to identify whether a foreclosure is considered in the calculation of an insurance score, or included in premium calculation separate and distinct from an insurance score? Or both? Also, does foreclosure refer to a particular consumer's foreclosure distinct and separate from insuring a particular piece of property, or is it intended to refer to a foreclosure on a particular house or property a policyholder is seeking to insure? Or both?

Question 5

Is it an acceptable answer to this question for insurers to cite the relevant state law provisions governing insurers' use of credit information?

Question 6

Is it an acceptable answer to this question for insurers to cite the relevant state law provisions governing re-underwriting and re-rating requirements when an insurer receives notice that the credit information of a current insured was incorrect or incomplete?

Question 8

For those carriers who have used insurance scores for years, the answer to question 8(c) may simply be unknown. Is it an acceptable answer to state this?

Question 12

Is it an acceptable answer to this question for insurers to cite the relevant state law provisions governing the treatment of no hits/thin files for those insures who use credit information?

Question 13

We question the inclusion of this question in that the making of a firm offer of insurance and terms thereunder are governed exclusively by the federal Fair Credit Reporting Act (FCRA). We question the need to gain information about a practice over which states exercise no authority.

PCI appreciates your consideration of our concerns with the data call. If you have any questions about any of our comments, please feel free to contact me at 847-553-3656 or alex.hageli@pciaa.net.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hageli", is written over a horizontal line. The signature is stylized and somewhat cursive.

Alex Hageli