



July 12, 2024

Philip Barlow, Associate Commissioner
Department of Insurance, Securities & Banking (DISB)
1050 First Street, N.E.;
Suite 801
Washington, DC 20002

Re: DCIF Rebuttal Submission on May 14, 2024 DISB Request for Comment – *Report on Market Conduct Examination – Evaluating Unintentional Bias in Private Passenger Automobile Insurance (Market Conduct Review)*

Dear Associate Commissioner Barlow:

The District of Columbia Insurance Federation (DCIF) welcomes the opportunity to provide this rebuttal submission in response to DISB’s May 14, 2024 Request for Comment regarding DISB’s Draft Report on *Market Conduct Examination – Evaluating Unintentional Bias in Private Passenger Automobile Insurance (Market Conduct Review)*.

Through its national insurance trade association members, DCIF represents the overwhelming majority of insurers writing private passenger automobile (PPA) coverage in the District of Columbia. Therefore, by reference, DCIF incorporates into these rebuttal comments the rebuttal comments of DCIF’s national trade association members, the American Property Casualty Insurance Association (APCIA) and the National Association of Mutual Insurance Companies (NAMIC). Given this, DCIF’s rebuttal comments are intentionally brief as not to be repetitive of other rebuttal comments submitted.

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As noted in DCIF's original comments, there are many references throughout the Market Conduct Review that suggest DISB may seek additional data calls related to the initial Market Conduct Review. Comments from the Consumer Federation of America (CFA) and Legal Aid DC openly encourage such additional data calls. For this reason, DCIF emphatically reiterates the point that DISB's inquiries into the PPA marketplace over the past five years have requires the subject insurers to incur significant costs and devoted significant time and other resources.

Given this history, DCIF and its national trade association members feel that any further data calls in the PPA marketplace would be excessive and not in the best interest of PPA policyholders in the District of Columbia.

DCIF looks forward to working closely with DISB, its contractors and other stakeholders as the Market Conduct Review becomes final.

Sincerely,

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