



June 8, 2015

Chris Shultz
Deputy Commissioner
300 Capitol Mall, 17th Floor
Sacramento, CA 95814

RE: Information Request Relating to Group Insurance

Dear Mr. Shultz:

It has come to our attention that several of our member companies recently received a request from the Department relating to private passenger auto coverage, specifically with respect to group rates. It is our understanding that this request comes in the context of the Department considering regulations that would implement the provisions of California Insurance Code 1861.12. As always, our companies are more than willing to comply with Department requests for information; however, we would like to ask for some assistance from the Department to help our companies comply.

First, as many of our companies just received the request this week, we request an extension to June 30, 2015, so that companies have sufficient time to provide the Department with thorough and complete information.

Secondly, the companies would like assurance that any information regarding affinity groups that carriers provide to the Department will be classified as "confidential." Our member companies consider this information proprietary trade secrets, which for competition purposes, they do not want shared with other companies or anyone outside of the Department.

Lastly, it would be helpful to have a better understanding of how the Department intends to use the requested information. Does the Department intend to aggregate the information or publish it? For what other purposes might the Department plan to use the information?

We appreciate your time on this matter and look forward to hearing from you. Please respond to the following contacts at their respective trades:

Mark Sektnan, ACIC President (mark.sektnan@pciaa.net)
Steve Suchil, AIA Assistance Vice President (ssuchil@aiadc.org)
Christian Rataj, NAMIC Senior Director (crataj@namic.org)
Shari Mchugh, on behalf of PADIC, (smchugh@mchughgr.com)
Kara Cross, General Counsel, PIFC (kcross@pifc.org)

cc: Geoffrey Margolis, Deputy Commissioner, Special Counsel
Joel Laucher, Deputy Commissioner, Rate Regulation