



April 18, 2025

Honorable Rebecca Bauer-Kahan, Chair
Honorable Diane Dixon, Vice Chair
Members, Assembly Privacy and Consumer Protection Committee

RE: AB 75 (Calderon): Residential property insurance images (Amended - 2/11/2025)

Position: Oppose Unless Amended

The Personal Insurance Federation of California (PIFC), the American Property Casualty Insurance Association (APCIA), the National Association of Mutual Insurance Companies (NAMIC), and the Pacific Association of Domestic Insurers (PADIC), collectively known as the “trades” whose members collectively write the vast majority of property and casualty insurance policies in the state of California, thank you for the opportunity to express our opposition (unless amended) regarding **Assembly Bill 75 (Calderon): Residential property insurance images**.

Insurance companies must verify the continued maintenance of a property that they have underwritten. Notice of their right to inspect is included in the initial policy issuance documents and in the annual renewal notifications. Historically these inspections have had to be conducted by insurance agents physically visiting a property. In more recent years, companies have been able to utilize the photo inventory collected by third party contractors to verify the state of a property and inform policy holders where there are deficiencies to be righted. The shift to aerial imaging as decreased the physical risk to agents, who previously would have to enter potentially hostile environments as well as inspect roof conditions and has decreased the cost to companies. The cost benefit cannot be dismissed at a time where any cost savings in the industry improves market availability.

While the industry understands and respects the spirit of AB 75 and the goal of providing greater transparency and awareness to consumers, the bill as drafted would be impossible for companies to comply with.

Because insurance companies do not direct the contractor when to take photos, but rather request existing photographs from the contractor’s inventory, it is impossible for the insurer to give notice in advance of the photograph being taken. When the insurer requests the photograph it is possible that the contractor collected aerial images up to 18 months prior depending on weather, population density, and other factors specific to the contractor.



We have provided redline amendments to the author suggesting the following changes to the bill to protect the increased clarity to the consumer, while making the bill functional from an implementation perspective.

- Include the notice of use of aerial imaging in the initial policy issuance and annual renewal notifications rather than a standalone notice 30 days prior to the image being taken. As stated above, the 30-day pre-notification would be impossible for insurers to comply with. An insurer does notify their policy holder of their right to inspect annually, and the notification of aerial imaging for that inspection could naturally be included in the existing notice.
- Clarify that when a consumer has opted-in to receive electronic communications the notification need only be sent electronically, rather than both by US mail and electronically.
- Limit the distribution of aerial images to the policy holder to situations where the image is the sole reason for an adverse underwriting decision.

For these reasons, the trades are respectfully opposed to AB 75 unless the offered amendments are taken to address the above concerns.

Thank you for your consideration.

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