



March 17, 2020

Commissioner Jon Godfread, Chair
Commissioner Mark V. Afable, Vice Chair
Artificial Intelligence (EX) Working Group
NAIC Central Office
1100 Walnut, Suite 1500
Kansas City, MO 64106-2197

Attn: Denise Matthews, Director, Data Coordination and Statistical Analysis

VIA Electronic Mail: dmatthews@naic.org

RE: 2nd Draft National Association of Insurance Commissioners (NAIC) Principles on Artificial Intelligence (AI)

Dear Commissioner Godfread and Commissioner Afable:

The American Property Casualty Insurance Association (APCIA)¹ appreciates the opportunity to provide additional feedback on the draft National Association of Insurance Commissioners' (NAIC) Principles on Artificial Intelligence (Draft Principles). Attached for your consideration are the APCIA recommended edits to the second draft. Notably, the introductory language we offer is a work-in-progress and intended to promote dialogue amongst the Working Group. APCIA recognizes the apprehension to including definitions in a high-level document but remains highly concerned with the potential breadth of the Draft Principles and uncertainty created by undefined terminology. Respectfully, APCIA urges the Working Group to explore a set of use cases to provide important meaning and context that can educate the content of the Draft Principles. APCIA would be pleased to assist in the development of these use cases to help guide conversation on a future call.

Thank you for the opportunity to comment and we look forward to continued collaboration. If we can answer any questions, please let us know.

Respectfully submitted,

A handwritten signature in black ink that reads "Angela Gleason". The signature is written in a cursive, flowing style.

Angela Gleason

¹ Representing nearly 60 percent of the U.S. property casualty insurance market, the American Property Casualty Insurance Association (APCIA) promotes and protects the viability of private competition for the benefit of consumers and insurers. APCIA represents the broadest cross-section of home, auto, and business insurers of any national trade association. APCIA members represent all sizes, structures, and regions, protecting families, communities, and businesses in the U.S. and across the globe.