CEJ’s has two comments on the 4/27/21 draft:

1. Since the group decided not to include definitions of primary and excess coverage, we suggest changing the name of Excess to Excess / Secondary Coverage. While many policies refer to coverage in excess of other insurance or indemnity, many policies refer to secondary coverage. Both terms are used to indicate other than primary coverage. Since both terms are used, we suggest it would be clearer to insurers who use Secondary in their policies if the MCAS coverage was entitled Excess / Secondary. If there is a concern with this proposal, that suggests that definitions of Primary and Excess are needed.

2. What was the reason for not including the median days to final payment data element? This data element is found in all the property-casualty MCAS blanks. Travel insurance is a property/casualty product filed as inland marine. This is an incredibly useful data element for analysis in combination with the claim date range data elements to distinguish companies who are routinely at the high end of the date range from those at the low end of the date range. Further, industry has argued again and again for consistency across MCAS Blanks and it is unclear why that consistency should not apply to this data element. Finally, the definition of the data element already exists and has been tested for over a decade, so there is no issue in developing a definition.

Birny

On 4/28/2021 1:20 PM, Cooper, Teresa wrote:

I failed to include some on the first message, so I’m sending this out again. Sorry about that.
Good Morning,

Redline and clean copies of the Travel MCAS Data Call and Definitions documents which include the edits discussed during the Travel call yesterday are attached.

Please respond with any suggested edits to the clean copy no later than close of business on Friday, 4/30/20.

Also, let me know if you have any questions or concerns.

Thank you,

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