



**Texas Department
of Insurance**

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September 15, 2025

Homeowners Market Data Call (C) Task Force (via email only):
Aaron Brandenburg (abrandenburg@naic.org)

RE: Homeowners Market Data Call

Dear Commissioner Yaworsky and task force members:

Thank you for the opportunity to comment on the data call template and definitions for the Homeowners Market Data Call.

TDI submits the following comments for the task force's consideration:

- Clarify what percentage of the market will be subject to the data call. Will it be at least 80% of the U.S. residential property insurance market as it was with the PCMI data call? Has NAIC or the states considered requesting that all admitted companies report this data?
- Clarify if residual markets (e.g. FAIR Plans, etc.) will be subject to the data call. If data from residual markets is collected, the data call template should include a field to distinguish the residual market entities from the voluntary insurers so analysis can be done separately or combined.
- Clarify how states would get company-specific data? Is this part of the sharing agreement?
- The description for the count of PIF with non-state-required mitigation discounts includes as examples roof strapping, impact resistant roofing material, and storm shutters. If the non-state-required mitigation discounts is a sum of the count for fortified, wind, fire/wildfire, impact/hail, and water discounts, consider moving these examples to the applicable mitigation discount. Note that the count of PIF with state-required mitigation discounts does not include this same text.
- Consider adding instructions to the data call to include information on how certain columns in the template relate to one another. For example,
 - The sum of counts of paid claims by peril in columns X, Y, and Z = total count of paid claims in column W

- The sum of paid losses by peril = total paid losses
- The sum of the count of PIF with state (or non-state) required specific mitigation discounts (fortified, wind, etc.) = count of PIF with state (or non-state) required mitigation discounts

Thank you for your efforts and consideration.

Respectfully,

A handwritten signature in blue ink, consisting of stylized, overlapping loops and a long horizontal line extending to the right.

Mark Worman

Deputy Commissioner

Property and Casualty Division