



Division of Insurance Market Regulation

April 17, 2025

Sent via email: hmarsh@naic.org

Mr. Joshua Guillory, Chair
c/o Hal Marsh
NAIC Market Conduct Annual Statement Blanks (D) Working Group
National Association of Insurance Commissioners
110 Walnut Street, Suite 1500
Kansas City, MO 64106-2197

Dear Chair Guillory:

Thank you very much for the opportunity to comment on the most recent proposed changes to the Private Passenger Auto Market Conduct Annual Statement blank.

The Missouri Department of Commerce and Insurance supports the proposed edit of the Private Passenger Auto MCAS Blank Draft dated 04/03/25. However, upon reviewing the draft and the accompanying instructions, we identified a potential source of confusion regarding the proposed addition of the data element related to policies enrolled in a telematics product.

More specifically, the current proposal is to add the following data element:

Number of policies in force at the end of the period that are enrolled in a Telematics product(s).

The definition section of the current instructions does not include a standalone definition for "telematics." Instead, it provides a definition for the phrase "telematics and usage-based data." Furthermore, the interrogatory section of the document asks whether the company employs "telematics or usage-based data."

If the intent of the new data element is to capture information based on the current definition, we suggest revising the data element as follows:

Number of policies in force at the end of the period that are enrolled in a ~~T~~telematics or usage-based data product(s).

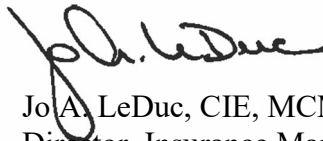


This amendment will help ensure a clear tie between the interrogatory question, the current definition and the proposed new data element.

If the new data element is solely to collect information about telematics products, we recommend that the instructions clearly define the term "telematics." This will ensure that companies fully understand the data they are required to report under the new data element.

Thank you for allowing us to share our thoughts. Please let us know if you have any questions about our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "JoA. LeDuc". The signature is written in a cursive style with a large initial "J" and "L".

JoA. LeDuc, CIE, MCM, CPCU, FLMI, AIDA
Director, Insurance Market Regulation Division