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Sent: Thursday, April 1, 2021 3:38 PM
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Cc: Chester, Rachel <Rachel.Chester@dbr.ri.gov>
Subject: Market Conduct Exam Guidelines (D) Working Group Comment

Based on the discussion on the Working Group's March 30th, Rhode Island wanted to write a note in support of including the National Producer Number in the Title Insurance In-Force standardized data request (SDR).

We support the inclusion of the NPN in the SDR. If a state doesn't use the NPN field for their licensed title producers, it seems simple enough to drop off the data request, since these fields are only guides. But since most states use the NPN field, we think it should be included.

In Rhode Island, every title producer is licensed with the Department and has an NPN. Our Rhode Island Chief of Consumer and Licensing Services also noted that while NPN usage might not be universal, it is used in *most* states. It's also possible that the commenter we heard in the working group was unaware of the use of the NPN in his state, because some states (Rhode Island included) also issue a state license number. But the NPN provides a unique identifier across multiple states and allows states to best utilize the Producer Database (PDB), which is a valuable tool in identifying producers information related to their activities in other states. The NPN is also a helpful tool in differentiating producers with similar and even identical names to avoid departments from licensing confusion.

Best,
-Matt

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