



July 24, 2019

Mr. Greg Welker, Antifraud & Producer Licensing Program Manager, NAIC
Producer Licensing Uniformity (D) Working Group
Via email to gwelker@naic.org

Re: Proposed amendments to the NAIC Uniform Licensing Standards for Surplus Lines and
the NAIC State Licensing Handbook

Dear Mr. Welker

On behalf of the Wholesale & Specialty Insurance Association (WSIA)¹ we appreciate the opportunity to provide comments on the proposed revision to the State Licensing Handbook Chapter 10 Surplus Lines Producer Licenses. We have provided our comments on the attached marked copy of Chapter 10. Our noted revisions take into account various statutory and regulatory changes related to surplus lines since this chapter was last published. We track these types of changes for purposes of our members' compliance with states' regulatory requirements and are happy to share additional information in these areas should it be of interest to the Working Group. We appreciate the work you are undertaking to revise the Handbook and continue to implement modernization in the area of producer licensing.

Sincerely,

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Director of Government Relations
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¹ Effective August 1, 2017, the National Association of Professional Surplus Lines Offices (NAPSLO) and the American Association of Managing General Agents (AAMGA) merged to form the WSIA. WSIA is the U.S. professional trade association representing the wholesale and specialty insurance market and the wholesale distribution system. WSIA presents approximately 400 wholesale broker member firms, 100 surplus lines insurance companies, and 200 associates and service providers to the surplus lines market, our membership operates in more than 1,500 offices representing tens of thousands of individual brokers, insurance company professionals, underwriters and other insurance professionals worldwide – all of whom are committed to the wholesale distribution system and U.S. surplus lines market.