American Property Casualty Insurance Association℠
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November 4, 2026

NAIC Market Conduct Examination Guidelines (D) Working Group
NAIC Central Office
1100 Walnut Street
Suite 1500
Kansas City, MO 64106
Via email: pwallace@naic.org

RE: Revised Cybersecurity Event Response Coordination Framework

Dear Chair Bache and Members of the Market Conduct Examination Guidelines (D) Working Group:

The American Property Casualty Insurance Association (APCIA) appreciates the opportunity to comment on the revised Cybersecurity Event Response Coordination Framework. APCIA supports the goal of improving coordination among state insurance regulators during significant cybersecurity events and reducing duplicative information requests that can divert resources from incident response and recovery efforts.

We appreciate the Working Group's responsiveness to stakeholder feedback. The revised draft includes several meaningful improvements, including clarification that the Framework does not create new reporting obligations or regulatory authority, the establishment of a presumed Coordinating Lead State, stronger direction that participating states coordinate information requests through the Lead State, and added discussion of confidentiality and the NAIC's supporting role.

While the revisions address many of APCIA's previously raised concerns, we offer several observations for further consideration.

First, additional refinement of the activation criteria may be warranted. Although the revised Framework replaces the prior open-ended standard with a more structured approach, the threshold of events that "*potentially* affect policyholders across 5 or more states" could remain difficult to apply during the early stages of an incident, when key facts regarding scope, affected populations, and operational impacts are often unknown. Greater clarity regarding how the criteria should be evaluated when information is incomplete would help promote consistent application and avoid unnecessary escalation.

Second, we encourage continued attention to the role of the Coordinating Lead State. The Framework appropriately establishes a presumption that the domiciliary regulator, or an existing Lead State, will serve in that role. Preserving that presumption and limiting departures from it to truly exceptional circumstances will help ensure continuity, reduce uncertainty, and reinforce existing regulatory relationships.

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Finally, confidentiality protections are fundamental to the success of any coordinated response framework. While the revised draft strengthens the confidentiality discussion, additional clarity regarding the safeguards that apply when information is shared among participating states would further enhance confidence in the process and support effective information sharing during cybersecurity events.

Overall, the revised draft represents meaningful progress and addresses many of the concerns raised by industry stakeholders. We appreciate the Working Group's continued engagement and look forward to continued dialogue as this effort moves forward.

Thank you for your consideration.

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