

July 23, 2026

Brett Bache, Chair
Market Conduct Examination Guidelines (D) Working Group
c/o Petra Wallace, Senior Market Regulation Specialist
NAIC
1100 Walnut Street, Suite 1500
Kansas City, Missouri

Re: Cybersecurity Event Response Coordination Framework ("the Framework")

Dear Mr. Bache and Members of the Working Group:

Thank you for providing the opportunity to review and comment on the Cybersecurity Event Response Coordination Framework ("the Framework"). While we support the concept of a coordinated response on large events that are national or multijurisdictional in scope, California has some concerns with the Framework as it is currently presented.

Of over-riding general concern are the related conversations regarding the Cybersecurity Event Notification Portal and its limitation in access to only those states that have adopted the NAIC Insurance Data Security Model Law #668. Since not all states have adopted Model #668, this Portal's central role to the implementation of the Framework will result in the exclusion of the 20+ states that have not adopted #668. (California is one of those that has not adopted #668, because it would diminish the insurer data breach reporting obligations found in existing CA law.) Extending access to the Portal, and thus the ability to more fully benefit from any coordinated effort/response, to states that have not adopted Model #668 but which nevertheless have their own independent information security laws of comparable quality would mitigate this concern and enhance the overall effectiveness of the Framework. Limiting access and participation seems to run contrary to the stated purpose for the Framework.

Thank you again for the opportunity to provide comments.

Sincerely,



Pamela J. O'Connell, CPCU
Chief, Market Conduct Division
California Department of Insurance