NAMIC
NATIONAL ASSOCIATION OF MUTUAL INSURANCE COMPANIES

317.875.5250 | [F] 317.879.8408
3601 Vincennes Road, Indianapolis, Indiana 46268

202.628.1558 | [F] 202.628.1601
20 F Street N.W., Suite 510 | Washington, D.C. 20001

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Mr. Brett Bache (RI), Chair
NAIC Market Conduct Examination Guidelines (D) Working Group
c/o Petra Wallace, Senior Market Regulation Specialist
Via email pwallace@naic.org

Re: NAMIC Comments on the Cybersecurity Event Response Coordination Framework Draft.

Dear Chair Bache and Members of the Working Group:

On behalf of our members, the National Association of Mutual Insurance Companies (NAMIC)[1], this letter offers comments on the draft Cybersecurity Event Response Coordination Framework. However, given the recent development of an NAIC cyber incident, NAMIC recommends pausing all projects until the NAIC can demonstrate that it has remediated the threat vector and that its systems are safe.

NAMIC generally supports the development of a coordinated, lead-state approach to cybersecurity event response. Establishing a clear lead state can help ensure regulatory efficiency and allow insurer resources to remain focused on incident response and mitigation, rather than being diverted to duplicative or inconsistent regulatory inquiries across multiple jurisdictions.

To that end, NAMIC believes the framework should clarify that the insurer's domestic regulator serves as the default lead state, with a first right of refusal. This approach would leverage the domestic regulator's familiarity with the insurer's operations and risk profile while promoting consistency in oversight.

NAMIC also encourages additional details regarding the role of NAIC staff within the framework. Greater clarity on how NAIC staff will support coordination, communication, and information flow among participating states would enhance transparency and operational effectiveness.

Overall, the framework appears workable and represents a constructive step toward improving multi-state coordination. As the framework is further developed, NAMIC looks forward to working with the Working Group to address key implementation details, including how information will be shared across states, access and role permissions for relevant information systems, and whether participation is limited to jurisdictions of the NAIC Cybersecurity Portal in facilitating coordination.

[1] *The National Association of Mutual Insurance Companies (NAMIC) is the foremost trade association representing the property/casualty insurance industry. Serving more than 1,300 member companies—including local and regional insurers as well as some of the nation's largest carriers—NAMIC members collectively write $467 billion in annual premiums, representing 61% of the homeowners and 53% of the automobile insurance markets. For more than 130 years, NAMIC has been the leading voice advancing public policy solutions and regulatory frameworks that promote a strong, competitive market and protect our members and their policyholders.*

NAMIC appreciates the Working Group's efforts and looks forward to continued engagement on this initiative.

Sincerely,

Erica Weyhenmeyer

Erica Weyhenmeyer, CPCU, MCM, AIE, WCP
Policy Vice President- Market Regulation & Workers' Compensation
NAMIC