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November 5, 2026

Brett Bache (RI), Chair
NAIC Market conduct Examination Guidelines (D) Working Group

Re: Cybersecurity Event Response Coordination Framework (Exposed 10/20)

Chair Bache and Members of the Working Group:

On behalf of the National Association of Mutual Insurance Companies (NAMIC)[1], we are writing in response to the October 20th exposure of the Cybersecurity Event Response Coordination Framework. Attached to this letter are our suggested redlines, and below is additional explanation relative to those redlines.

Our primary suggestion is that the ultimate multi-state engagement be housed under MAWG. The Framework mimics the referral process already in place when recommendations are made for a multi-state approach. Additionally, because the framework contemplates using state statute via a lead state to protect information, data, and communication as a result of insurer inquiry, MAWG would be the most appropriate place for those proceedings.

Separately, we suggest areas throughout the Framework where reference to NAIC staff involvement should be removed. Specifically, we recommend removing NAIC staff involvement where such involvement relates to staff providing substantive assistance. NAIC staff is meant to be a form of administrative assistance not to provide regulatory recommendations. We therefore note that the appropriate coordinating parties for carrying out this Framework are the Cybersecurity Working Group and applicable State Regulators only.

Sincerely,

Erica Weyhenmeyer
Senior Policy Vice President
Market Regulation & Workers' Compensation

Lindsey Stephani
Senior Policy Vice President
Data Science, AI, and Cybersecurity

[1] The National Association of Mutual Insurance Companies 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 $453 billion in annual premiums, representing 58 percent of the homeowners and 52 percent 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 member companies and their policyholders.

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