VIA E-MAIL

January 10, 2014

Director Michael McRaith
Federal Insurance Office
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington DC 20220

Dear Director McRaith:

As President of the National Conference of Insurance Legislators (NCOIL), I am writing to respectfully request, in light of the recent Federal Register notice seeking applicants for Federal Advisory Committee on Insurance (FACI) membership, that you appoint a state legislator to FACI. NCOIL believes that it is vital to have a state legislator’s voice on FACI, specifically the NCOIL President or his or her designee, as NCOIL lawmakers have the knowledge, experience, and standing to be a valuable resource to the Federal Insurance Office (FIO) as a FACI member.

State legislators play a critical role in insurance, which is primarily regulated at the state level. NCOIL lawmakers work with our regulator colleagues to ensure robust oversight that both ensures consumer protections and seeks efficiencies for our insurance communities.

State legislators have been at the forefront of successful state insurance policymaking and modernization efforts for over 150 years. Most recently, as front-line partners with state insurance regulators in implementing the Dodd-Frank Act, state lawmakers provide both experience and perspective that will be important to FIO’s mission and serve as an important direct link to the larger legislative community.

If the FIO is to serve as a single U.S. voice in international insurance policy, it will benefit from knowledge and expertise that only a state legislator can provide. Their experience on the ground in the states will help inform FACI and the FIO of important insurance matters as they emerge, as well as provide a critical perspective when considering covered agreements between the U.S. and foreign governments.

NCOIL legislators are deeply involved in crucial insurance decisions facing the states, including financial solvency regulation and state accreditation, fallout from the recent financial crisis, reinsurance policy, rate modernization, market conduct, speed-to-market, natural disaster and terrorism insurance, surplus lines reform, and international accounting standards. They coordinate ongoing with a myriad of public and private-sector insurance stakeholders—including Members of Congress, governors, attorneys general, state and international regulators and parliamentarians, as well as consumer and industry representatives—and would complement the Committee’s expertise and enhance its balance.

We strongly believe that a state lawmaker, a proven national leader on insurance public policy, would provide diversity sought for FACI membership while showing lawmakers—at the state and federal level—that policymaker input is important to the FIO mission.
Thank you for your consideration of our request. Please feel free to contact me at 334-395-0123 or at repgregwren@yahoo.com. You may also contact Susan Nolan, NCOIL Executive Director, at 518-687-0178 or by email at snolan@nolan-associates.com, should you have any questions.

Sincerely,

Rep. Greg Wren, AL
NCOIL President

cc: James Brown, FIO Senior Policy Advisor
Secretary Jacob Lew, Department of the Treasury
Treasury Office of Domestic Finance
White House Office of Intergovernmental Affairs
U.S. Senate Committee on Banking, Housing, & Urban Affairs
U.S. House Committee on Financial Services
NCOIL legislators