

# MEMORANDUM

**To:** NCOIL Property & Casualty Insurance Committee

**From:** Nearmap

**Re:** Comments on the NCOIL Model Act Regarding Insurers' Use of Aerial Images (Draft of May 18, 2026)

**Date:** May 29, 2026

## Introduction

Nearmap appreciates the opportunity to comment on the Model Act Regarding Insurers' Use of Aerial Images. As a leading provider of high-resolution aerial imagery and AI-derived property analytics to the U.S. insurance industry, Nearmap supports the Committee's effort to establish a workable national framework that protects consumers while preserving the legitimate use of aerial imagery in underwriting. Nearmap is broadly supportive of the model act and offers targeted refinements for NCOIL's consideration.

**Recommendation 1:** Tighten the image recency requirement from 24 months to 9 months. A 9-month standard ensures that a property is assessed based on imagery captured during the policy period under review. Modern aerial capture programs routinely refresh urban and suburban areas more frequently than once per year in the markets where most U.S. residential property is concentrated, such that a 9-month cadence is operationally feasible. Several states, including California, Georgia, and New York, have adopted or are considering guidelines specifying image recency requirements of 9 months or less.

**Recommendation 2:** Establish a minimum image resolution standard of 7.5 cm (3") ground sample distance (GSD) for any aerial imagery used to support non-renewal decisions. Lower resolution imagery cannot reliably reveal the property conditions that drive underwriting decisions. The images below illustrate the impact on image clarity: the left image, captured at 4.3 cm GSD, exceeds the proposed 7.5 cm standard; the right image, captured at 15 cm GSD, falls well below it.

