

## OIC Rules Coordinator

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**From:**

[REDACTED]  
Tuesday, November 26, 2024 10:39 PM

**To:**

OIC Rules Coordinator

**Subject:**

Rules coordinator (policy) - Secure Result #15004007

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### External Email

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**First name**

Emily

**Last name**

Dodd

**Email**

[REDACTED]

**Rule number/topic**

CR - 101 to R 2024-7 Premium Change Transparency

**Comment(s) or question(s)**

While I support what phase 1 has required this far, I believe it is important I share my concerns. I feel that the newly proposed amendment to extend the implementation of the second phase deep into 2029 should not be made. The proposed suggests that insurance companies need more time to collect data, from those they insure, which will then be used to justify any one, or many, available "reasons" given, for why a person's premiums have increased. The proposal to extend the start of phase 2 begs the question: If auto insurance companies were not already mining and collecting said aggregate data, how can previous rate increases to anyone's policy be rightly and legally justified? Given that some sort of data, credit history, age, garaging location, or any other legally acceptable factor, have been used to determine premiums prices, no company should require more time to collect. I am to clearly outline why I feel there are no means to justify the extension as proposed and it is a mere stall tactic to keep the consumers in the dark longer. Even with phase 1 already rolled out, without the timely implementation of phase 2, insurance companies will continue to charge already obscenely high premiums. Why? because there is (currently), no requirement to provide any reason or justification.

As a consumer that has experienced an increase in premium at renewal time following several coverage periods without a ticket or an accident, I firmly stand against this proposed delay of phase 2. The original date of implementation, which is set in 2027, is roughly three years from now. I feel that is more than enough time for these companies to collect and analyze data

they already have.

Furthermore, I raise concern that, regardless of the amount of time given, these companies will do little more than formulate blanket statements to be used in response to customer inquiries, claiming any data used to formulate their decision is proprietary.

I hope my comments not just help in this decision but serves as a testament to why so many are unable to afford the luxury of car insurance. The true median income is probably closer to half that of what is reported for this state. Most people are at or below "poverty" levels, even with full time jobs. Not many can afford every thing and are forced to sacrifice basic needs to pay for all things transportation related.

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