

Center for Economic Justice Comment

I write on behalf of the Center for Economic Justice, a consumer advocacy organization, and as a designated NAIC consumer representative in support of the proposal to remove pet insurance from limited lines producer licensing. We agree with the point made by Nationwide that pet insurance is not incidental to the provision of pet health care services, any more than human health insurance is incidental to the provision of human health services.

In addition, we note that there are a number of managing general agencies and insurers who sell pet insurance directly to the consumer via the internet and several websites aggregating these direct-to-consumer offerings. These websites, which include Nationwide's pet insurance and pet insurance sold by at least eight other MGAs/insurers, provide consumers with the opportunity to learn about pet insurance generally, compare product features and actual prices, and review policy forms. This degree of consumer information is not even available for auto and home insurance!

We believe that regulators and regulation should be supporting and promoting the type of pro-consumer direct-to-consumer sales and should discourage sales by third-parties to a captive audience -- that is, discourage sales of pet insurance by pet stores and pet care providers.

We believe that requiring a P&C license to sell pet insurance will discourage and eliminate some of the third-party sales and continue to encourage the direct-to-consumer internet sales.

Thank you for your consideration,

Birny Birnbaum

Director

Center for Economic Justice