



Jeffrey Junkas
Vice President, State Government Relations

February 4, 2020

The Honorable Daire Rendon
Michigan House of Representatives
Anderson House Office Building
S-1387 House Office Building
Lansing, MI 48933

RE: SUPPORT Senate Bill 172 – Consumer Privacy Notices

Dear Chairwoman Rendon:

The American Property Casualty Insurance Association (APCIA) is the primary national trade association for home, auto, and business insurers that promotes and protects the viability of private competition for the benefit of consumers and insurers. We respectfully submit the following comments in support of Senate Bill 172.

Senate Bill 172 is a straightforward, common-sense bill that will streamline annual privacy notices to consumers from insurers and help reduce the volume of paper mail, which is better for the environment and lowers costs.

The 2015 bipartisan passage of the 'Fixing America's Surface Transportation' (FAST) Act included changes to the Gramm-Leach-Bliley Act (GLBA) regarding annual privacy notices. Those changes eliminated the requirement that financial institutions provide annual privacy notices when no change has occurred to its privacy policies and practices, as described in its most recent notice, and only provides nonpublic personal information to nonaffiliated third parties in accordance with certain provisions of the GLBA or implementing regulations.

Advancing SB 172 provides state-level authority for insurers doing business in Michigan to utilize these GLBA changes and would allow Michigan to join the now 36 other states (as of December 2019) that have enacted such laws or regulations. Consumers would benefit from this change because, instead of getting redundant notices that are typically, reflexively, thrown away, they will likely take greater heed to the notices as it will have material changes. As well, less paper mailings reduces waste and cost in the system.

We respectfully urge you and your colleagues to vote "YES" on SB 172.

Thank you for the consideration of our perspective. Please contact me directly at 847-553-3678 or via email at jeffrey.junkas@apcia.org or APCIA's Michigan counsel, Andrew Doerr at 517-374-9187 or via email at ADoerr@dykema.com, with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Junkas", written in a cursive style.

Jeffrey Junkas