



National Association of
Professional Surplus Lines
Offices, Ltd.

4131 N. Mulberry Dr., Ste. 200
Kansas City, MO 64116
816.741.3910
F 816.741.5409

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Congressman Stivers:

On behalf of its membership, the National Association of Professional Surplus Lines Offices (NAPSLO) is pleased to support the *Insurance Data Protection Act*. NAPSLO appreciates your leadership and continued efforts to ensure the statutory interpretation and implementation of the Dodd-Frank legislation is consistent and workable throughout the insurance industry.

NAPSLO is the national trade association representing the surplus lines industry and the wholesale insurance distribution system. NAPSLO's membership consists of approximately 400 brokerage member firms, 100 company member firms and 200 associate member firms, all of whom operate over 1,500 offices representing approximately 15,000 to 20,000 individual brokers, insurance company professionals, underwriters and other insurance professionals in the 50 states and the District of Columbia.

The *Insurance Data Protection Act* enacts sensible, much needed reforms to the Federal subpoena authority as it relates to insurance data. Under this legislation, if the Federal Insurance Office (FIO) or the Office of Financial Research (OFR) wish to issue a subpoena, they must first verify that the requested information is not available through a state regulator or other federal agency or source and, if not, must reimburse the insurance company for the cost of producing the information. In addition, the bill would enact necessary confidentiality requirements to protect nonpublic data. These proposed changes address issues particularly important and impactful to the surplus lines industry.

Including these revisions prevents insurance companies from unnecessary and costly reporting requirements that would ultimately add little value while increasing the costs of doing business. As in any business, these costs would ultimately be felt by the consumers of our services.

NAPSLO and its member companies congratulate you on the introduction of common-sense legislation which recognizes the nature of our industry.

Sincerely,

Handwritten signature of Brady R. Kelley in blue ink.

Brady R. Kelley
Executive Director

Handwritten signature of Keri A. Kish in blue ink.

Keri A. Kish
Director of Government Relations