

- 1) We support working with the proposed revised SBC as the federal agencies have suggested
- 2) We support consumer testing, and commit ourselves to working on an expedited schedule so that consumer testing will be possible without delaying the introduction of a revised SBC for next year
- 3) We believe that the extensive contact that our groups have in working with consumers and with navigators uniquely qualifies us to speak for consumers and for their needs and experiences.
- 4) The SBC is not a marketing tool. It is rather an aid to help consumers compare available plans to determine which best meets their needs.
- 5) To be useful to this end, the SBC must:
 - to the extent possible permit apples to apples comparisons. Although different products have different features, the SBC should focus on the common features that distinguish plans
 - provide accurate information--if the coverage calculator produces incorrect information, the SBC misleads rather than assists consumers
 - focus on product features that are most immediately important to consumers, such as premiums, cost-sharing, including deductibles and what is covered before the deductible is met, and networks and formularies
- 5) The SBC should help educate consumers regarding important insurance terms and concepts and why product features matter to consumers although the SBC may not be able to inform a consumer as to all relevant features of an insurance product, a consumer who carefully reads an SBC should not later be surprised to discover that a product the consumer purchased has significant undisclosed exclusions or limitations.
- 6) To the extent that plans offer truly innovative features, these must be described in such a way that they are readily understandable to consumers. Consumers must be able to understand how innovative features distinguish a product from other products, and how these features make the particular product more or less beneficial to the consumer.