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.