



October 29, 2008

Superintendent Chavez
New Mexico Department of Insurance
PO Drawer 1269
Santa Fe, New Mexico 87504-1269

Dear Superintendent Chavez:

On behalf of the California Land Title Association, which has represented the title insurance industry within California since 1907, I would like to thank you for giving CLTA and the title industry the ability to provide comments to the Title Insurance Working Group regarding a "nationwide statistical plan."

As you may or may not be aware, the California Department of Insurance is currently in the process of significantly revising the title insurance statistical plan regulations already in place through the formal regulatory process. Given the Administrative Procedures Act (APA) requirements for regulatory revisions, I would anticipate that it will take several more months before the final regulations will be in place and the APA process finished. Thus, I'm not sure how CLTA – or the Department of Insurance – will be able to share any definitive and helpful recommendations or comments by the November 7, 2008 deadline due to the fact that we haven't finalized our own statistical plan at this time.

Obviously, I'm sure we all share the common goal of making the exchange of information and working group efforts as effective and efficient as possible, and would respectfully request that you extend the deadline into the next year so that CLTA and other affected groups can contribute to your efforts in a more productive and helpful manner.

Once the California regulations have been finalized we would be in a much better place to provide formal comments to the NAIC about what we will be using in California and how it might affect a more standardized approach across the nation for data collection. I'm sure you agree that obtaining information from California, even though delayed, would be important, both because of its size and the scope of its existing and planned regulatory structure in this area for both underwriters and underwritten title companies.

Finally, I would also strongly recommend that the NAIC Working Group further analyze which states the group believes should provide statistical and data call information relevant to your study of a possible "nationwide statistical plan." CLTA and our member companies would be willing to be a part of that discussion in the future as some of our member companies might favor the collection of data in a more uniform manner throughout the country rather than responding the multiple statistical plans. However, what data elements should be included, which states should participate in the study, etc., all need to be carefully considered and evaluated before CLTA could provide a formal position on the issue.

Again, our sincerest thanks for the outreach from NAIC on this effort and seeking our comments. Please do not hesitate to contact me if you have any further questions on this or any other title related issue.

Respectfully,

A handwritten signature in black ink, appearing to read 'Craig C. Page', with a stylized flourish at the end.

Craig C. Page
Executive Vice President
and Counsel