



January 23, 2009

Ms. Keri A. Kish, Antifraud Counsel
National Association of Insurance Commissioners
2301 McGee Street, Ste 800
Kansas City, MO 64108

Re: Model Antifraud Plan Guideline

Dear Ms. Kish:

The National Insurance Crime Bureau (NICB) would like to thank the Antifraud Liaison Working Group of the NAIC Antifraud Task Force for soliciting comments and opening the draft Model Antifraud Plan Guideline for discussion. It is our understanding that the Guideline is generally intended as the beginning of a *Best Practices* document to be utilized by the Fraud Directors. While many states presently require fraud plans, there are variations among their requirements. The Guideline may be useful in trying to standardize some of the diversity.

As the Working Group further discusses this issue in 2009, NICB will be happy to provide any input at the appropriate time. The NICB is a national, not-for-profit organization supported by approximately 1,000 property/casualty insurance companies. Working with our member companies and law enforcement, we investigate organized criminal conspiracies dealing with insurance fraud and vehicle theft.

We appreciate your consideration of our views.

Sincerely,

A handwritten signature in black ink that reads "Alan Haskins". The signature is written in a cursive, flowing style.

Alan Haskins
Director, Government Affairs
National Insurance Crime Bureau