The Honorable Bruce Ramge  
Chair Market Regulation Accreditation Working Group  
National Association of Insurance Commissioners  
2301 McGee Street, Suite 800  
Kansas City, MO 64108-2662

Dear Director Ramge,

Thank you and the NAIC staff for putting together the first draft of the Market Regulation Accreditation Program. We suggest that we proceed by identifying the year each standard will be incorporated. For Example, Category I Resources Standards 4 & 5 are fairly self-explanatory and most states are in fact complying. These two standards could be considered for implementation in year one of the program. On the other hand Category II Market Analysis Standard 1 may require incremental implementation as “full participation” with respect to timeliness, accuracy, and completeness as specific metrics for meeting theses may require some moderate deliberation. Furthermore some standards may require deliberation and the policymaker level (such as Category I Resources Standard 1).

We further suggest that some standards be referred to specific “D” Committee Working Groups or Task Force which develops best practices on the activity for its input on refining or defining the metric(s) for each standard. For example, Category II Market Analysis Standard 1 should be referred to MISTF and its working groups, Category II Market Analysis Standards 2 and 3 be referred to MAP. This process will ensure that the definitions and metrics are properly vetted by the “subject matter expert” groups. They should provide a recommendation for final consideration by the Market Regulation Accreditation Working Group.

Finally, there are a couple of other technical items that should be addressed on the current proposal:

**Category II Market Analysis Standard 1** - Someone suggested in Phoenix to incorporate subsequent or equivalent systems—as ETS functionality will be converted to MATS later this year.

**Category II Market Analysis Standard 3** —The trigger for examination is also entered into ETS (MATS in the future).
Thank you for the opportunity to share our thoughts. We hope these comments are helpful to the process.

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