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December 15, 2008

BY EMAIL

The Honorable Sean Dilweg
Commissioner of Insurance
State of Wisconsin
Chair, Climate Change and Global Warming Task Force
National Association of Insurance Commissioners (NAIC)
2301 McGee Street, Suite 800
Kansas City, Missouri 64108
ATTN: Pam Simpson (psimpson@naic.org)

Re: November 26th Draft of the Insurer Climate Risk Disclosure Survey

Dear Commissioner Dilweg:

On behalf of the American International Group, Inc, (AIG), I offer the following comments regarding the November 26, 2008, draft of the Insurer Climate Risk Disclosure Survey. We believe that this draft is a vast improvement over prior drafts, as the entire approach of the document has changed for the better. This version, in the form of a survey, is much less daunting than the prior drafts, which read more like litigation interrogatories in an adversarial setting. We believe that this survey will elicit more useful and meaningful information than the prior drafts, as insurers will be more forthcoming with information because the fear of being forced to provide confidential and/or proprietary information, as well as forward-looking statements, has been eliminated.

Also, we were particularly pleased to see that the questions included in the survey were similar to those found in the Carbon Disclosure Project questionnaire (CDP), and that those companies already responding to the CDP could, effectively, use those same responses to satisfy this survey. This will save a great deal of time and effort and will eliminate potentially duplicative reporting exercises.

The information elicited by this survey will provide consumers, investors and regulators with a basic review of insurers' activities in this area. Further, if the need arises regulators may request additional information in areas of particular concern. We think this is a logical compromise and a much more practical means of getting important information out to regulators and the public, while still protecting the needs and interests of competing insurers.

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As in every new reporting effort developed by the NAIC, however, we must emphasize that uniformity will be crucial to the success of this endeavor. We suggest that all regulators use this model survey and take the time to evaluate the information received pursuant to it, before any begin developing climate change inquiries of their own.

Additionally, there was some discussion during the December 5th Task Force meeting regarding the development of a "Guidance" document, to supplement the survey. We look forward to working with you in the development of that document, as well.

We thank you for the opportunity to comment on this draft, and we would especially like to thank you for your stewardship of this project. From the outset you have shown a great deal of understanding and patience and we greatly appreciate your leadership throughout this process. If you have any questions or need any additional information from us, please do not hesitate to contact me.

Thank you.

Sincerely,

/s/

Paul S. Brown