

Comments received via e-mail December 16, 2008

Pursuant to your request, our comments and concerns regarding the Insurer Climate Risk Disclosure Survey are:

1. As our prior comments shared, the trigger levels for the disclosures are too high. Therefore, Commissioners should have the power to request the disclosure from any given domestic company when he or she deems it pertinent according to the company's financial conditions and/or any particular economic situation that might make him or her believe that the conditions affect the company or the public best interest.
2. We are very concerned with instruction number V. As stated, it practically makes the requirement superfluous since it provides the insurer the argument for non-compliance from the outset. It is our position that if we leave this instruction, the efforts regarding the disclosure will remain without effect.

We will appreciate that these comments are taken into consideration.

Cordially,

Miriam Ortiz-Rodríguez, CPCU
Supervisor
Property and Casualty Insurance
Office of the Commissioner of Insurance
B5 Tabonuco Street, Suite 216
PMB 356
Guaynabo, PR 00968-3029
Ph: (787) 304- 4103
Fax: (787) 273-6082