



American Society of Travel Agents
1101 King Street, Suite 200
Alexandria, VA 22314

Tel 703.739.2782
Fax 703.684.8319
800.ASK.ASTA

askasta@astahq.com
www.ASTAnet.com

October 23, 2009

Members of the National Association of Insurance Commissioners
("NAIC")
Producer Licensing Working Group
Attn: Greg Welker
2301 McGee Street, Suite 800
Kansas City, MO 64108-2662

Re: Comments to Limited Lines Insurance – Draft for Limited Lines
Categories, Lines of Authorities, Definitions, and License Requirements

Dear Mr. Welker and Working Group Members:

On behalf of the American Society of Travel Agents (ASTA), I would like to express our concern with the Producer Licensing Working Group Limited Lines Proposal of October 6, 2009 ("October 6 draft") and at the same time offer our support of comments filed by Greg Mitchel of Frost Brown Todd on October 19, 2009 and USTIA on October 22, 2009.

As expressed in Greg Mitchell's proposal, licensing and consumer protection could be achieved at the program administration level. This approach is reasonable and should be considered before unnecessary and costly regulatory hurdles are set in motion. Imposition of new regulatory obligations, without discernable rationale or benefit, will inevitably lead to costly and prolonged battles in each state that undertakes to impose such burdens. Absent a demonstration of compelling public need, this is a self-defeating and pointless path to follow.

As noted in our September 11, 2009 letter to the working group, no evidence has been presented to support the need for increased regulatory oversight of travel agents that act as referral agents for travel insurance providers.

ASTA is prepared to confer directly with you in any mutually feasible manner to assist in reaching this goal. Thank you for considering our views.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul M. Ruden", is located below the "Respectfully submitted," text.

Paul M. Ruden
Senior Vice President
Legal & Industry Affairs