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RE: Limited Lines Standard Regarding Non-Core Pet Health Insurance

Dear Mr. Welker:

We are aware that the Producer Licensing (EX) Working Group is considering a proposal from Nationwide Insurance to revise the Uniform Licensing Standards - #37 Standards for Non-Core Limited Lines to remove the optional pet insurance limited line.

We would like to register comments in opposition to this proposal. We support the NAIC maintaining the option for states to adopt pet insurance as a non-core limited line for numerous reasons. Given ULS #37's provision for pet insurance as optional, this standard appropriately leaves to the states the ability to establish their own position on how to address the licensing of producers of pet insurance. We support leaving this optionality with state legislatures.

Further, we believe that a limited lines option can provide an effective means of reaching more pet owners so that they can take advantage of valuable coverage. Consumers demand ready access to coverage in environments where it is most timely and relevant to them. Limited lines licenses are useful in assisting industry to meet that demand.

We are cognizant of Nationwide's argument regarding product complexity, but see that as an issue of product design and clarity of written disclosure. This is a matter for insurer product governance and product regulatory oversight, not a basis for changing the producer licensing standard.

We appreciate the working group considering our comments and request that the working group take no action to remove the existing provision for pet insurance as a non-core limited line.

Regards,

Dan Vaughn
Chief of Staff
Aspen Insurance