

September 20, 2021

Via Electronic Mail <a href="mailto:bruce.sharp@fiscal.treasury.gov">bruce.sharp@fiscal.treasury.gov</a>

Bruce Sharp, Bureau PRA Clearance Office Bureau of the Fiscal Service United States Treasury Department Room #4006-A, P.O. Box 1328 Parkersburg, WV 26106

Re: OMB Control No. 1530-0014, Annual Letters-Certificates of Authority (A) and Admitted Reinsurer (B)

Dear Mr. Sharp:

As a leading representative of the surety industry, The Surety & Fidelity Association of America ("SFAA")<sup>1</sup> is writing in response to the information collection notice published on July 20, 2021, concerning OMB Control No. 1530-0014, Annual Letters-Certificates of Authority (A) and Admitted Reinsurers (B). We appreciate the opportunity to comment on how the Bureau of the Fiscal Service (Bureau) can streamline and enhance its processes related to issuing annual certificates of authority to Treasury approved sureties and reinsurers.

The surety industry generally recognizes the scope of the information the Bureau requests on an annual basis is appropriate and industry representatives noted the process works well. SFAA has no proposed changes to the information currently required by the Bureau. However, several sureties noted the method and security of submitting the required information may be improved if the Bureau implements a web portal system. Currently, the use of email to transmit information poses some difficulty due to the large file size of the required information. A web portal system, such as the Pay.gov portal, would help streamline the manner in which insurers and reinsurers submit the required information and also would ensure the documents are properly protected against potential cyber breaches.

We appreciate the Bureau's work to thoroughly regulate fiscal requirements for the surety industry and the opportunity to comment on this request for information.

Sincerely,

Jales Attano

Julie Alleyne,

Vice President, Policy and General Counsel

<sup>&</sup>lt;sup>1</sup> SFAA is a trade association of more than 425 insurance companies that write 98 percent of surety and fidelity bonds in the U.S. SFAA is licensed as a rating or advisory organization in all states and it has been designated by state insurance departments as a statistical agent for the reporting of fidelity and surety experience.