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February 24, 2017

Federal Insurance Office
Attn: Richard Ifft, Room 1140 MT
Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

Re: 2017 TRIA Data Collection Form Comments

Dear Mr. Ifft:

We are submitting these comments on behalf of the International Underwriting Association of London ("IUA"). The IUA is a trade association representing London Insurance Market insurers that operate from City of London offices, generally located in close proximity to the Lloyd's of London building. The IUA's membership includes 46 insurers, of which approximately 26 are listed by the National Association of Insurance Commissioners ("NAIC") on the Quarterly Listing of non-U.S. surplus lines insurers compiled by the International Insurers Department ("IID") of the NAIC. For more information about the IUA, please refer to the association's website www.iua.co.uk.

The IUA appreciates the opportunity to submit comments regarding data collection of certain insurance data and information regarding participation in the Terrorism Risk Insurance Program ("TRIP"). IUA members, as NAIC/IID-listed insurers, participate in TRIP and therefore, must offer terrorism coverage in accordance with the TRIP requirements. Accordingly, as part of the NAIC/IID-listing requirements, insurers must file information regarding terrorism annually on the Schedule of TRIA Premiums and Losses – a schedule to the IID Financial Filing Format.

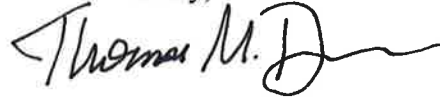
For the year ending on December 31, 2016, we have recently learned that NAIC/IID-listed insurers must file a new Schedule of TRIA Premiums and Losses by October 1, 2017. We understand that Treasury and the Federal Insurance Office ("FIO") are considering extending the deadline for the 2017 TRIA Data Collection for alien insurers to the later IID deadline of October 1, 2017, and we urge Treasury and FIO to do so.

Currently, 31 CFR 50.51 requires insurers, including alien insurers, to submit certain data and information relating to TRIP by May 15th of each calendar year. If alien insurers were required to adhere to this deadline of May 15th in 2017, the difference with the IID deadline would, in effect, result in NAIC/IID-listed insurers having to report terrorism data to Treasury and FIO over 4 months earlier than they would otherwise be required to do. Therefore, the IUA urges Treasury and the FIO to extend the deadline for reporting terrorism data at least for the year ending on December 31, 2016 from May 15, 2017 to October 1, 2017.

The IUA recognizes that FIO must report to Congress by June 30th of each year on reports and studies based upon annual data collected. However, the IUA also understands that FIO's report to Congress in 2017 will not focus on alien insurers, such as NAIC/IID-listed insurers. Thus, extending the deadline to October 1, 2017 for alien insurers to report terrorism data would not have any negative impact on FIO's ability to adequately report to Congress by June 30, 2017.

We thank Treasury and FIO for considering these comments on the timing of the 2017 TRIA Data Collection. Should you have any questions or wish to have additional information please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Thomas M. Dawson", with a stylized flourish at the end.

Thomas M. Dawson