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February 27, 2017

Richard A. Ifft  
Federal Insurance Office  
Department of the Treasury  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

RE: 2017 TRIA Data Collection Form Comments

Dear Mr. Ifft:

The National Association of Mutual Insurance Companies (NAMIC)<sup>1</sup> is pleased to respond to Treasury's request for public comment on its proposed data collection forms for use in the 2017 TRIA data collection process.

We have reviewed the proposed forms and accompanying "data dictionaries" for use by "Insurer (non-small) Groups or Companies" and "Small Insurers." In general, we find the forms to be reasonably manageable and the dictionaries to be helpful and thoughtfully executed.

We would, however, ask that Treasury consider collecting all workers compensation-related data from the National Council on Compensation Insurance (NCCI). As you may know, the state insurance regulators followed that approach with respect to the terrorism insurance data call that they administered last year, and the results appear to have been satisfactory. Allowing NCCI to submit workers compensation data on insurers' behalf would significantly reduce the amount of time and effort that companies will expend in complying with Treasury's data collection process.

Finally, we would be remiss if we did not comment on Treasury's determination that "the needed information will not be available in a timely or meaningful manner from other sources." We have previously expressed our dismay at the apparent inability of Treasury and state insurance regulators to collaboratively develop a single data call that could be used by both federal and state entities, to avoid the present situation in which insurers must respond to two separate data calls administered at different times of the year. We fervently hope that with new leadership at

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<sup>1</sup> NAMIC is the largest property/casualty insurance trade association in the country, serving regional and local mutual insurance companies on main streets across America as well as many of the country's largest national insurers. The 1,400 NAMIC member companies serve more than 135 million automobile, home, and business policyholders and write more than \$196 billion in annual premiums, accounting for 50 percent of the automobile/homeowners market and 31 percent of the business insurance market.

Treasury and the Federal Insurance Office, the FIO will find a way to cooperate with state insurance regulators on future efforts to collect terrorism insurance data.

We hope you find these comments useful, and we look forward to continuing to be a resource to the FIO. Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, reading "Robert Detlefsen". The signature is written in a cursive style with a long, sweeping horizontal line at the end.

Robert Detlefsen, Ph.D.  
Vice President, Public Policy