

2019 TRIP Data Call – Request for Comments

Deanna Nikolai

Sentry Group NAIC# 0169

Non-Small Insurer

1800 North Point Drive

Stevens Point, WI 54481

715.346.7942

- **NBCR Coverage:** Exposures and Reinsurance Worksheets:
 - With our policies, if **Terrorism coverage is Included on the policy it also Includes NBCR**, and if policies **Don't include** terrorism coverage it **also Excludes NBCR**. We don't offer NBCR coverage by itself nor have policy limits specific to NBCR coverage.
There are **Conditional Exclusion and Exclusion of NBCR** endorsements; however, we haven't adopted, nor do we use/offer any of the NBCR exclusion endorsements, thus these don't apply to our coverage/policies.
 - Note: We need direction on how to report for the new NBCR questions being we can't separate out NBCR from our Terrorism coverage.
 - How should we report NBCR on the Exposures Worksheet? Do we leave blank, list 0's, or mirror the totals we provide for the Terrorism related questions?
 - The NBCR modeling question for Reinsurance is currently under review, we will advise if we have any additional questions after review is complete. Currently no questions at this time.
- **Worksheets/Instructions:**
 - When will the TRIA 2019 templates and instructions be finalized and Insurer's notified?
 - Given the complexity and time involved with this call, it's imperative Insurers have as much time as possible to react to any changes that are requested to meet the May 15th deadline.
Hopefully changes that are made after the initial worksheets/instructions are released it will be minimal if any.
- **Announcing the Call:**
 - Bulletin mentions that the States will not simultaneously announce with the Treasury announcement and is expected for the States to announce later.
Given the complexity and time involved with this call, it's imperative Insurers have as much time as possible to collect, process, and report the data in order to meet the May 15th deadline.
 - Any more insight as to when the States will announce the 2019 TRIA call?
- **Supplement Property (Table 1D) worksheet:**
 - Bulletin mentions that within the "Request for Comments" request by the States, the Supplement Property (Table 1D) was not mentioned at all which may suggest this will not be required with the 2019 TRIA call. The Supplement Property Table 1D is very detailed with data drilled down to the State/zip code level which is very time consuming and takes great effort. We don't understand the value of this detailed data down to the State/Zip code level for the States.
We are aware that NAMIC and PCI are also making inquiries to NY DFS to discontinue this Property Supplement Table 1D.
 - We ask that the Supplemental Property (Table 1D) worksheet for TRIA 2019 and moving forward won't be required.
 - Any additional insight if the Supplement Property (Table 1d) will be required for TRIA 2019, or when the final decision will be made to include or exclude this from TRIA 2019?
 - Note: It's imperative Insurers have as much time as possible to react if this worksheet would be required in order to meet the May 15th deadline, due to the level of detail being requested and the effort/time it takes to complete.

- **Estimates of Burden:**

- Mentioned in the PCI Bulletin for the Treasury Call, **Federal Register 11_9_18.pdf**, for Non-Small Insurer's it's estimated to take approx. 75 hours to collect, process, and report the data.
 - For our Sentry NAIC group #0169, this burden estimate is considerably lower compared to our total investment in collection, processing, reporting, and submission of the data for the Treasury and States call, including property supplement request.
 - Question: Being we report our data to ISO, is it possible to have ISO report our data on our behalf at no additional cost?

- **Any Changes:**

- With TRIA, so far, each year there has had changes made from the prior year's call. There has also been some tweaks made in the finalized templates/instructions that usually are released in the April prior to the May 15th deadline.
 - Given the complexity of this call, and the time and effort required to complete this call accurately and on time, we ask that the call is stabilized, and the reporting metrics and instructions don't change yearly. With each change this adds additional burden on the insurers to modify data extractions and reporting of the data to match the new requests and still be able to meet the required Mandatory meet the May 15th deadline.
 - If ISO would be able to report on our behalf this would be most efficient being we already report our data to ISO.

- **Penalty:**

- What is the penalty if we don't meet the deadline for the TRIA 2019 data call of May 15th?
- We don't plan on missing the May 15th; however, given the complexity of the call and continual changes, if we were to submit TRIA after May 15th, we would like to understand what the penalties would be.