

July 13, 2023

NAIC Privacy Protections (H) Working Group
NAIC Central Office
1100 Walnut Street
Suite 1500
Kansas City, MO 64106

Attn: Lois Alexander, NAIC Market Regulation Manager
Via email: laalexander@naic.org

Dear Chair Johnson, Vice Chair Amann, and Members of the Privacy Protections Working Group:

The undersigned joint trades appreciate the Privacy Protections (H) Working Group (PPWG or Working Group) releasing a new draft Consumer Privacy Protections Model Law (Model #674) for interested party feedback. We respectfully ask the Working Group to extend the comment deadline for Version 1.2 to allow reasonable and appropriate time to gather input from our membership so that we can provide meaningful feedback. We also recommend the date of the July 25th open meeting be moved back to better allow our associations to analyze the new draft, and to collect, organize, and submit comments.

Our organizations take the Model #674 drafting effort seriously and have demonstrated that in our engagement with the Working Group. We appreciate the time and dedication the Working Group has invested in this project, and we believe it is critical to reciprocate with the same diligent and thoughtful analysis and response. Privacy is an important matter, and an insurance-specific approach must reconcile with the context of the industry, align with the broader landscape for financial institutions nationally, and consider certain state and federal requirements. Because of the seriousness and breadth of this drafting endeavor, the trades respectfully urge for adequate time to work with members to review the current draft – and future drafts – closely. Any privacy model law ultimately developed by the NAIC must be practical, reasonable, and workable; ensure that its provisions are integrated and work well together, and achieve the intended objective of protecting consumers while allowing licensees to meet their business obligations. We fear that rushing this process may unintentionally hinder efforts to achieve these outcomes and undermine the Working Group's goal of uniform and widespread state legislative enactment of its final work product.

We, the undersigned organizations, appreciate the opportunity to continue to have our members' constructive feedback considered, and look forward to continued robust dialogue as the drafting process continues. Thank you for your consideration of this request.

Please do not hesitate to contact any of the organizations below with questions.

Sincerely,

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