

WA Comment

Here are WA's comments:

After reviewing the materials with the presenters, it is not clear what the end result of Nationwide's proposal is. While they believe pet insurance is a "highly complex" product, it is no more complex than other types of products. ULS #37 provides an example of what non-core limited lines would be, and guidance for how state regulators should license those non-core limited lines. As stated in Nationwide's presentation, only a few states have pet insurance as a limited line. WA, for example, would require a producer license with the property line of authority. This requires 20 hours of pre-licensing education and passing the property insurance exam. I have a difficult time believing this is the direction Nationwide is supporting, leading me to believe there is another step to their proposal. If their overall objective is to create a separate line of authority, license type, education, or exam for pet insurance, I do not support that whatsoever as it does not comply with the PLMA.

Thanks,



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