



**May 9, 2017**

**TO:** The Honorable Paul Holvey, Chair, House Committee on Business & Labor  
The Honorable Janelle Bynum, Vice-Chair, House Com. Business & Labor  
Members, House Committee on Business & Labor

**FROM:** Katherine Pettibone, American Insurance Association  
Christian Rataj, National Association of Mutual Insurance  
Melanie Smith, Property and Casualty Insurers Association of America  
John Mangan, American Council of Life Insurers

**RE: SB 986 Implementing FAST Act on Privacy Disclosures**

**POSITION: SUPPORT**

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The American Insurance Association (AIA), National Association of Mutual Insurance Companies (NAMIC), the Property and Casualty Insurers Association of America (PCI) and the American Council of Life Insurers (ACLI) are pleased to support SB 986, a bill that allows Oregon to implement the federal Fixing America's Surface Transportation Act (FAST Act) amendments to the Gramm Leach Bliley Act (GLBA). These amendments eliminate the annual privacy notice requirement contained in the GLBA thereby streamlining and reducing redundant notifications.

The National Association of Insurance Commissioners (NAIC) adopted a model bulletin ("Gramm Leach Bliley Act (GLBA) Annual Privacy Notices NAIC Model Bulletin) and are finalizing amendments to Model Regulation #672, "Privacy of Consumer Financial and Health Information Regulation, to foster the clarification of the FAST Act changes for insurance licensees across the country. SB 986 is substantively consistent with the annual notice changes to GLBA and as reflected by the NAIC.

We strongly believe the annual notice relief makes good sense for the following reasons:

- **The modifications streamline and simplify redundant annual privacy notice obligations.**

- **The GLBA revisions enjoyed strong bipartisan support in Congress in a time of gridlock.** The amendments to the GLBA were included in Fixing American's Surface Transportation (FAST) Act, which was signed into law on December 4, 2015.
- **The modifications to the GLBA will benefit insurance licensees and their customers and have a positive benefit on the environment.** Fewer paper notice obligations will benefit the environment, insurers, and consumers.

On behalf of our member insurers, we would urge your support on this important issue.