

November 15, 2024

***Transmitted via email***

TO: Chair Skip Newberry & Members of Joint Task Force on Artificial Intelligence

**RE: Proposed AI Definition Terms on Artificial Intelligence**

Chair Newberry and Members of the Task Force,

Thank you for the opportunity to provide feedback on the proposed AI recommendations and for the Task Force's collaborative and transparent process. The American Property Casualty Insurance Association (APCIA), the National Association of Mutual Insurance Companies (NAMIC) and the Northwest Insurance Council (NWIC), whose members write the vast majority of Property & Casualty insurance policies in force in Oregon today, understand the importance of ensuring any AI regulatory framework is flexible and evolves with rapidly changing technology. It is in that spirit we offer the following comments.

The trades and our member companies also previously responded to the Task Force survey regarding AI definitions. We thank the Task Force for including a repository of trusted resources rather than providing prescriptive definitions for AI-related terms. These resources will equip legislators and regulators with foundational tools for shaping future legislation without prematurely locking in definitions that may not remain relevant and/or may not apply evenly across various industries or organizations.

As the Task Force is already aware, AI is already subject to a broad range of existing laws and regulations at both the state and federal levels, addressing risks such as privacy, discrimination, and bias. We recommend that the Task Force consider including guidelines encouraging legislators to carefully review these current frameworks and engage with stakeholders before creating new laws. This will help avoid unnecessary duplication or conflict with existing statutes/regulations and ensure that any new regulations address novel risks that are not already covered.

Additionally, we urge policymakers to exempt Property & Casualty insurers from additional AI-specific regulations, as the P&C insurance industry is subject to a comprehensive set of laws and regulations that ensure consumer protection and fairness. We believe consumers will be best served by focusing on enhancements within the existing regulatory framework, which addresses many of the identified and/or potential risks associated with AI use in insurance.

In closing, we commend the Task Force for its work and look forward to the final report. We encourage caution in recommending specific AI definitions at this stage and urge legislators to carefully consider the existing regulatory landscape before enacting additional laws. This will help ensure that any new laws and regulations are targeted, effective, and avoid unnecessary conflict or overlap with existing law.

Respectfully,

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