



February 14, 2023

Oregon State Legislature
House Committee on Business and Labor

RE: HB 3186, P2P – NAMIC’s and NWIC’s written comments in support

Sent via email

Dear Representative Holvey, Chair; Representative Elmer, Vice-Chair, Representative Sosa, Vice-Chair; and honorable committee members:

Thank you for affording the National Association of Mutual Insurance Companies (NAMIC) and the Northwest Insurance Council (NWIC) an opportunity to submit written testimony in support of **HB 3186**. We are aware of and stand in agreement with similar comments of support tendered by our colleagues at the American Property Casualty Insurance Association (APCIA).

In 2019, after extensive deliberation and debate that involved lawmakers throughout the nation, consumer protection advocates, the car-sharing industry, the insurance industry, national property and casualty insurance trade associations, and the rental-car industry, the National Council of Insurance Legislators (NCOIL) drafted and adopted a “Peer-to-Peer Car Sharing Program Model Act” (the “NCOIL Model”). This measured and balanced model has since been adopted in 20 states. HB 3186 is closely aligned with the NCOIL model, providing significant protections for vehicle owners and consumers, while also providing predictability, flexibility and uniformity for companies writing auto insurance across the country and in Oregon.

NAMIC and NWIC support HB 3186 as a thoughtful way to address the structural regulation of the P2P industry for the protection of insurance consumers. The proposed legislation comprehensively addresses the regulatory framework of the P2P industry and provides necessary insurance coverage requirements that facilitate financial protection for insurance consumers and the general public. The trades are pleased that the proposed legislation conforms with key insurance requirements and consumer disclosures that are in the NCOIL Model so that there is insurance coverage during all times of the car-sharing period with no opportunity for gaps in insurance coverage protection for consumers.

For the aforementioned reasons, NAMIC and NWIC respectfully support HB 3186 and request your “yes” vote on the bill.

Respectfully,

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