



August 21, 2009

Mr. Jake Garn, Chair
Blanks Working Group
National Association of Insurance Commissioners
2301 McGee, Suite 800
Kansas City, MO 64108-2604

SUBJECT: Proposals Exposed for Comment at Summer 2009 NAIC National Meeting

On behalf of the American Land Title Association, thank you for the opportunity to comment on Blanks proposals exposed for comment at the Summer 2009 NAIC National Meeting related to title insurers.

- 2009-29: The subtitle on Schedule T should be changed from “By States and Territories” to Allocated by States and Territories to ensure consistency with the Schedule T format used by other lines. The Title Working Group made the change in an attempt to increase accuracy in reporting but consistency with other lines is preferable.
- 2009-30: The initial reporting date of 1st Quarter 2010 was inserted after the proposal was submitted to Blanks by the Title Working Group. The agreed upon date for initial reporting was December 31, 2010, in order to allow time to implement systems to collect the data.
- 2009-31: Our members are pleased to assist in greater data collection as proposed by the Title Working Group, but the time frame to implement the additional data reporting puts an unnecessary burden on the industry. Attempts to collect policy information on a State Page identifying whether transactions were on residential or non-residential properties are met with two significant challenges: availability of the information and systems implementation. Given these issues, we request the effective date be January 1, 2013, at the very earliest and January 1, 2014, as a preferred date in order to allow time to implement systems to collect the data and allow title underwriters to provide reliable and credible residential vs. non-residential data.

Thanks, again, for the opportunity to comment on these three proposals.

Sincerely,

Kurt Pfothauer
Chief Executive Officer