

August 7, 2025

Rules Coordinator
DCBS Division of Financial Regulation

Regarding: HB 2563 and Draft Regulations for Required Notices to Policyholders

Dear Ms. Winkel,

I make the following comments on behalf of United Policyholders (UP), a non-profit 501(c)(3) whose mission includes providing a voice for insurance consumers of all types of insurance.

UP is grateful that the Oregon Legislature has passed this new legislation that provides policyholders with a clear opportunity to get additional information with respect to their insurance premiums. We commented orally in the hearing on August 7 but would like to follow up by sharing our comments in writing.

We note that in the draft proposed regulations, subsection 836-XXX-XXX3(2), that in the "Premium change notice" which is the format that insurers will be required to use as a basic standard for their communications, the narrative in the second bullet point states:

"Your premium is impacted by (insurers insert the top four *rating* factors that most significantly contributed to the premium increase.), which will cause the price of your insurance to increase at renewal."

The enabling legislation does not limit the scope of causes of the increase to rating factors and it is important to note that the increase to the dwelling limit, often simply caused by inflation, can be the most impactful "factor" in increasing the premium. Therefore, we would suggest this alternative language:

"Your premium was impacted by several factors including these two/three/four which were most impactful in increasing your renewal premium (in order of their impact):

- 1.
- 2.
- 3.
- 4.

Here is an explanation of the impact for each of those (two/three/four factors)."

(If only one factor led to the increase the language would state:

"The factor which caused your premium increase was [state the factor].

Here is an explanation for that factor's impact:")"



United Policyholders would also like to note that this communication with policyholders who are concerned about premium increases is a valuable opportunity for the insurer to describe options that may be available for getting discounts on their premium including increasing the deductible, implementing mitigation actions that can reduce risk of loss, or placing other policies with the insurer to get a package discount. The enabling legislation does not prohibit this additional messaging.

Therefore, we suggest that this regulation should indicate that the insurer may use this communication regarding premium increase as an opportunity to add information about how the insured might be able to reduce the premium.

Respectfully submitted,

Joel Laucher
United Policyholders