

Hi Jeannette et al,

I would also like to thank you for sending out this very helpful chart.

I have already expressed our support for the threshold you initially proposed, so I will try not to belabor the point, but I want to reiterate that I think your initial proposal was very reasonable and I do not think that any reasonable interpretation of "prominent" would limit the number of prominent carriers in Oregon to three. I think an argument could be made for a lower threshold, since there are some carriers that reasonable people might consider prominent that are below the threshold, but any definition of "prominent" that does not include some of the most visible companies and brands in the state, including the carrier with the largest Marketplace enrollment, does not seem reasonable to me.

I do not think I am going out on a limb in saying that it is extremely unlikely that the legislative intent behind SB 231 was to limit the reporting to only the three largest companies in a highly competitive market with many prominent players.

Best,

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