



November 4, 2021

Mary E. Kosinski
Department of Insurance and Financial Institutions ("Department")
100 N. 15th Ave., Suite 261
Phoenix, AZ 85007-2630
mary.kosinski@difi.az.gov
public_comments@difi.az.gov

RE: Supplemental Public Comments to Proposed Rulemaking R21-93 amending R20-6-407

Dear Ms. Kosinski:

On behalf of the Service Contract Industry Council ("SCIC"), we would like to thank the Department for the opportunity to provide written comments and to participate in the oral hearing that occurred earlier today on the proposed rulemaking. In response to such hearing, we wanted to provide brief, supplemental comments in addition to the comments we submitted in our previous comment letter dated November 1, 2021.

The dialogue today in the oral hearing helped us understand the intent of some of the proposals made by the Department which were not clear from the rule as proposed. Our concern remains that certain sections and language in the proposed rule may still not be clear and consistent with the intent and may create unintended consequences. From the extent of the comments, including the discussion in today's oral hearing, we believe that substantive changes will be required to align the Department's intent with current Department practices and with industry practice and expectations. SCIC is happy to continue the dialogue with the Department to assure that any rule accurately reflects the intention of the parties.

The SCIC appreciates the opportunity to respond and we encourage further dialogue with the industry to ensure the final rule balances the interests of all impacted stakeholders. Thanks.

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Meenan". The signature is written in a cursive style and is positioned to the left of the printed name.

Timothy J. Meenan
Executive Director & General Counsel
Service Contract Industry Council

P.O. Box 11247 • Tallahassee, Florida 32302-1247 •

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