



Consumer Credit Industry Association
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Ms. Mary E. Kosinski
Department of Insurance and Financial Institutions
100 N. 15th Ave., Suite 261
Phoenix, AZ 85007-2630
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RE: Proposed Rulemaking R21-93 amending R20-6- 407

Dear Ms. Kosinski:

Consumer Credit Industry Association (“CCIA”) thanks you and the Department for the opportunity to comment during the hearing today for Arizona’s Proposed Rulemaking R21-93 amending R20-6-407.

The process of exposing the written comments from industry and inviting discussion from hearing participants was highly efficient and helpful. We particularly appreciated the Department sharing their perspectives and intent behind their proposed rules, several of which were beneficial to industry practices and experiences with the Department.

We expect that there will be further changes to the proposed rules in light of these discussions to ensure that the rules comport to the statute and reflect the industry practices we shared with the Department. To that, we would request further dialogue with the Department to craft the final rules.

I would also like to clarify our written comment that HB 2443 as enacted in 2021 did add a new section to 1095-06, Sec. 2, whereby a service company “ **may continue to use any service contract form approved by the director pursuant to sections 20-1095.01 and 20-1095.06, Arizona Revised Statutes, before the effective date of this act unless and until the service company submits a new service contract form for approval by the director on or after the effective date of this act.**”

We think it would be appropriate to include this language in the proposed rules to match statutory intent.

Again, we look forward to working with the Department on the proposed rules and all other compliance issues concerning the service company industry and its relationship with the Department and Arizona’s consumers.

Sincerely,