



INSURANCE BROKERS AND AGENTS OF THE WEST

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Stephen L. Young
Senior Vice President & General Counsel

24 October 2005

Ms. Natasha Ray
Counsel
California Department of Insurance
45 Fremont Street, 21st Floor
San Francisco, CA 94105

Re: RH 04037941: Revised “Action Notice” Filing Requirements

Dear Ms. Ray:

On behalf of the Insurance Brokers and Agents of the West, I am writing to support the revisions made to the proposed “Prescribed Method for Filing of Notices of Appointment of Agents and Notices of Termination of Appointment of Agents” regulations noticed by the California Department of Insurance.

We strongly support the deletion of the provision of the regulations—in originally-proposed Section 2194.43(a)—that would have required insurers to notify CDI whenever a notice of agency appointment is terminated “for cause.”

We have no further objections. Thank you for making this change. On behalf of the IBA West, thank you also for the opportunity to submit these comments on the revisions to the Department’s proposed regulations. If you have any questions concerning our testimony, or if we can provide any other assistance, please do not hesitate to contact me.

Very truly yours,

Stephen L. Young

Stephen L. Young
Senior Vice President and General Counsel