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The Insurance Federation of Pennsylvania, Inc.

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John R. Doubman Secretary & Counsel June 14, 2004

Robert E. Nyce Executive Director Independent Regulatory Review Commission 333 Market Street Harrisburg, PA 17101

Re: Insurance Department - Safeguarding Customer Information Regulation; Fiscal Note 11-215, 31 Pa. Code Chapter 146c

Dear Mr. Nyce:

The Insurance Federation supports the captioned final form regulation to be considered by the Independent Regulatory Review Commission on June 24, 2004. The regulation adds a new chapter 146c to the Insurance Department's regulations to address customer information privacy.

The regulation is based on a model regulation of the NAIC and constitutes the third leg of the Insurance Department's extensive regulations on privacy. The Insurance Federation has worked closely with the Department on developing the regulation and it appears to balance the needs of the public and insurers.

This will place the Federation's approval on record.

Sincerely, John R. Doubman

c: *V* Peter J. Salvatore, Regulatory Coordinator Pennsylvania Insurance Department

> James M. Smith, Regulatory Analyst Independent Regulatory Review Commission

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