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October 17, 2024

George D. Bedwick
Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: Insurance Department Final-form Regulation No. 11-262 Rescinding and Reserving 31 Pa. Code § 37; Adopting 31 Pa. Code 37a.

Dear Chairman Bedwick:

On behalf of the Insurance Federation of Pennsylvania (IFP), thank you for the opportunity to offer comments regarding the Insurance Department's final form regulation at **31 Pa. Code Chapter 37a. – Insurance Producers**, to be heard at the October 24, 2024 IRRC public meeting.

The IFP is a state trade association representing all lines of insurers. We support the Department's effort to modernize and streamline the existing producer licensing regulation at 31 Pa. Code Chapter 37a. The current regulation, Chapter 37, dates from 1994 and has not been modified since the passage of Act 147 of 2002.

We also wish to acknowledge the Insurance Department's collaboration throughout the regulatory process commencing with its publication of an exposure draft in 2023 to interested parties.

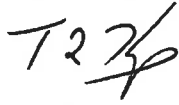
On June 10, 2024, the Federation submitted a letter as part of the public comment period of the proposed regulation. Our comments were intended to be constructive and improve the regulatory proposal.

On July 10, 2024, IRRC released its own comment letter referencing our suggested edits and subsequently, on July 30th we met with the Insurance Department to discuss our suggestions in more detail.

In its final form draft the Department has addressed the concerns we raised in our June 10th letter and July 30th meeting, and **we respectfully request IRRC approve the final form 31 Pa. Code Chapter 37a.**

Thank you for your consideration throughout this process.

Respectfully submitted,

Handwritten signature of Timothy L. Knapp in black ink.

Timothy L. Knapp, General Counsel
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cc: Corinne R. Brandt, IRRC
Fiona E. Cormack, IRRC