



April 14, 2026

Karima Woods  
Commissioner  
District of Columbia  
Department of Insurance, Securities and Banking (DISB)  
1050 First Street, NE, 801  
Washington, D.C. 20002

Re: Data Call

Dear Commissioner Woods

On behalf of the Casualty Practice Council's Automobile Insurance Committee and the P&C Committee on Equity and Fairness (the Committees) of the American Academy of Actuaries,<sup>1</sup> we appreciate the opportunity to provide input on the DISB's market conduct data call.<sup>23</sup> The Committees offer the following comments and would be happy to discuss any questions you may have.

We read the proposal as narrowly requesting information only on policies that have claims. If companies provide only policies with claims, the DISB would not be able to properly determine loss frequency, an important metric for understanding the distribution of insurance risk. We encourage the DISB to consider requesting information on all policies during the proposed time period instead.

Insurance data will be truncated by factors such as deductibles and parties settling directly without insurance. In other words, the population with insurance losses represents a biased sample. We encourage the DISB to consider gathering data from other information sources, such as police statistics and data aggregators like LexisNexis or Cambridge Mobile Telematics, to aid the DISB in better understanding the market.

Finally, please see below for input on specific fields:

Claims tab

- Lines 15-16 (exposures, policy producer) would fit better in the policy tab.
- The Incident Details includes free-form fields, which may add complexity and inconsistency to an analysis. One option to address this is to remove open-ended fields such as "Incident description" and provide a list of categories for fields such as "setting road".
- Lines 53-56 (loss detail) would largely be explained by the type of coverage to which the claim applies. We encourage the DISB to consider whether this information is necessary.

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<sup>1</sup> The American Academy of Actuaries is a 20,000-member professional association whose mission is to serve the public and the U.S. actuarial profession. For 60 years, the Academy has assisted public policymakers on all levels by providing leadership, objective expertise, and actuarial advice on risk and financial security issues. The Academy also sets qualification, practice, and professionalism standards for actuaries in the United States.

<sup>2</sup> [Data Call Description](#), DISB, Feb. 18, 2026

<sup>3</sup> [Data Call Claims Data Request](#), DISB, Feb. 18, 2026

- It is unclear why the subrogation information is relevant to your purpose. We encourage the DISB to consider whether this information is necessary.

#### Policy tab

- Some companies offer multi-vehicle policies. We suggest clarification on how these should be treated in the data call.
- The date range would indicate that, for example, a claim in January 2022 on a policy issued in December 2021 would not be included. If that is not the intention, we encourage the DISB to add clarification.
- Related to the first point made above: If a policy is in force the entire timeframe but has only one claim, would only the term with the claim be included?

Thank you for the opportunity to comment and provide feedback on the upcoming data call. If you have any questions or would like to discuss these comments further, please contact Rob Fischer, policy project manager, casualty ([fischer@actuary.org](mailto:fischer@actuary.org), 202-785-7865).

Sincerely,

Amy Ning, MAAA, FCAS  
Chairperson, Automobile Insurance Committee

Tyson Mohr, MAAA, FCAS  
Chairperson, P&C Committee on Equity and Fairness