



CADRI
CANADIAN ASSOCIATION
OF DIRECT RELATIONSHIP
INSURERS

November 12, 2019

Auto Insurance Policy Unit
Financial Institutions Policy Branch
Ministry of Finance
95 Grosvenor Street
Frost Building North, 4th floor
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Re: **Amendments to regulations made under the *Insurance Act* and the *Compulsory Automobile Insurance Act* regarding the delivery of certain records and other documents**

The Canadian Association of Direct Relationship Insurers (CADRI) is the voice of insurance enterprises that offer automobile, home and commercial insurance directly to Canadians. We advocate for flexible and evolving product and service innovation so that Canadians can easily choose insurance that serves their needs through the delivery channels of their choice.

CADRI welcomes the opportunity to contribute to the government's implementation of policies announced in the 2019 provincial budget – specifically -- *Putting Drivers First* – which seeks to make the auto insurance system more affordable and accessible for Ontarians.

We appreciate the government's commitment to modernize its regulations and allow Ontarians to conduct even more of their business transactions online. The recent announcement enabling Ontario drivers to carry an electronic copy of their proof of insurance documentation was one such progressive step.

Electronic communications are a fast and simple means for businesses, such as insurance companies, to communicate with their customers and vice versa. In this context, CADRI would propose that the government allow correspondence relative to the termination of insurance policies be among the electronic communications options offered to customers. This would enable insurers to offer their customers the choice of a start-to-finish electronic communications package.

Many insurance customers choose to have all their communications with their insurers come to them in electronic format. They are sometimes surprised, and even irritated, when there are deviations from this policy. Those who prefer to continue to receive hard-copy, paper communications would continue to have that option.

We note that other jurisdictions have taken this approach, Alberta recently announced that their *Fair Practices Regulation* had been amended to remove exceptions to electronic insurance transactions. This now allows Albertans to receive all their insurance communications electronically, including notices of termination.

We encourage the Ministry of Finance to amend its approach and allow policy terminations to be communicated electronically – if a consumer chooses the paper-free option.

CADRI - Regulatory amendments affecting the delivery of certain records and other documents

Once again, we appreciate the opportunity to contribute to the government's efforts to modernize the auto insurance system and make it more affordable and accessible to Ontarians. We applaud the steps taken to provide choice and convenience to Ontario drivers and look forward to supporting the government's efforts to do more of the same.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alain Thibault', written in a cursive style.

Alain Thibault
Chairman and CEO
CADRI

cc:

David Wai, ADM, Ministry of Finance
CADRI Board of Directors
CADRI Digital and Emerging Task Force
CADRI Ontario Committee