



23 October 2020

Mr. Mark White  
CEO  
Financial Services Regulatory Agency of Ontario (FSRA)  
5160 Yonge St., Toronto, ON M2N 6L9

Via: <https://www.fsrao.ca/engagement-and-consultations/fsra-service-standards>

Dear Mr. White,

**Re: 2020-12 – FSRA Service Standards**

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 regulatory and legislative frameworks governing automobile, property and commercial insurance to enable product and service innovation so that Canadians can easily choose insurance that serves their needs through the delivery channels of their choice.

CADRI appreciates the publishing of FSRA's Service Standards, the agency's commitment to quarterly reporting beginning early in 2021, and a review of its service standards and process in a year. Our remarks are focused on the standards affecting auto insurance, complaints, and licensing individual insurance agents.

By publishing its performance targets, FSRA is providing a new and welcome level of transparency. In addition, by setting out timelines, FSRA is making sure insurers and Ontario drivers will have realistic expectations for important regulatory processes.

In general, FSRA's expectations of turnaround times are reasonable, if not ambitious. We have two specific observations to make concerning: (1) those rate filing applications that do not meet the standard and (2) current licensing timelines.

**Rate filing standards and timelines**

In the cases of non-personal-passenger-auto filings, minor filings, major rate filings and underwriting rules, endorsement and form filings, FSRA expects to meet its standards between 80 and 90 percent of the time. Relative to the 10 to 20 percent of filings that do not meet the standard, CADRI recommends that FSRA set a cap or maximum on the time it takes to decide on these filings.

**Licensing individual agents**

Where the standards apply to the processing of individual agents' licence applications and renewals, we encourage the agency to move quickly toward its goals.

CADRI's members are pan-Canadian companies. Front-line, customer service employees holding agents' licences are held to high standards by these employers. They are subject to careful screening and ongoing supervision, coaching and training relative to regulatory compliance, product information and customer service. Often, they serve customers in more than one jurisdiction and hold licences from provinces and territories other than Ontario. If their Ontario licence application or renewal languishes with FSRA, they might be pulled off a phone queue, unable to serve customers until the licence is approved. In the interests of having as many qualified agents as possible available to meet consumer demand, CADRI would welcome 10-day processing of complete licence applications and renewals.

CADRI looks forward to FSRA's quarterly report and opportunities to comment on its performance relative to these service standards going forward.

Yours truly,



Alain Thibault  
Chairman and CEO, CADRI

cc:

CADRI Board of Directors  
CADRI Licensing Task Force  
CADRI Market Conduct Task Force  
CADRI Ontario Committee  
CADRI Risk Classification Task Force

Tim Bzowey, EVP Auto/Insurance Product, FSRA  
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