



February 25, 2022

Submitted electronically

Financial Services Regulatory Authority of Ontario
Auto Insurance Sector
25 Sheppard Avenue West, Suite 100
Toronto, Ontario
M2N 6S6

Re: ID 2021-022 – Consultation on Proposed Guidance for Automobile Insurance Non-Standard Forms, Endorsements and Certificates of Insurance Approval Filing Process

On behalf of CAA Insurance (CAA), I am pleased to share our comments in response to the Financial Services Regulatory Authority of Ontario's (FSRA) consultation (2021-022) on the proposed guidance for automobile insurance non-standard forms, endorsements and certificates of insurance approval filing process.

In reviewing the proposed guidance, CAA Insurance supports FSRA's intended efforts to help streamline the filing process.

Within the document, it notes that FSRA would notify an insurer in writing within 25 business days of submission, whether the filing is approved or rejected. While CAA Insurance supports this timeframe, we also suggest that if FSRA is unable to provide notification within the 25 business day period that insurers can proceed with the filing as if it is approved, until the insurer hears otherwise. This would be similar to structures in place through the AMF in Quebec, as well as in Saskatchewan.

Thank you for the opportunity to provide these comments. We welcome further discussions with FSRA representatives should you have any questions.

Sincerely,

Elliott Silverstein
Director, Government Relations
CAA Insurance Company