January 28, 2025

[submitted via FRSA website]

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

RE: Identifier: NO. PC0055APP: Proposed Guidance: Own Risk and Solvency Assessment (ORSA) for Ontario-incorporated Insurance Companies and Reciprocal Insurance Exchanges (the "Proposed Framework")

OSBIE has reviewed the comment letter from CAIR (Canadian Association of Insurance Reciprocals) regarding the newly proposed insurance Guidelines: Own Risk and Solvency Assessment (ORSA), and we support their comments provided in the letter.

Sincerely,

Jeff Pratt,

CEO & Attorney-in-Fact