



January 27, 2025

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

Re: Consultation on Proposed Automobile Insurance Filing Guidance

Definity Insurance welcomes the opportunity to contribute to the consultation on the proposed rate and underwriting rule filing processes, as outlined in chapter 4 of FSRA's Automobile Insurance Rating and Underwriting Supervision Guidance. As noted in our response to FSRA's consultation last year on the guidance's chapters on fairness, operations, controls, and governance, and accreditation, we support FSRA's vision for modernizing the regulation of auto insurance in Ontario.

In the case of the filing processes, we support allowing insurers that meet FSRA's comprehensive accreditation standards to have privileged access to fast-tracked filings that enable them to bring to the market certain rate and underwriting changes within one business day. The fast-tracked filings complement an accreditation program that provides FSRA with increased insight into an insurer's operations. For low-risk insurers—those with internal policies and procedures that demonstrate a commitment to treating customers fairly—FSRA can confidently stop reviewing all their rate and underwriting decisions before implementation.

We recognize that the specific eligibility criteria for the fast-tracked filings will be in the forthcoming filing manual. [REDACTED]

These criteria, combined with the other chapters of the supervision guidance and FSRA's enforcement and disciplinary tools, will create a safer and more dynamic market. FSRA will be able to dedicate its resources to supervising the rate and underwriting changes of insurers that present a higher risk to customers. And by positioning accredited insurers to maintain premiums and underwriting practices that reflect market conditions, they will have the confidence to invest more capital in the market. Ontarians will win by having more and better options on price, product, and service for addressing their auto insurance needs.

To position Definity to achieve FSRA's accreditation standards, we are undertaking an enterprise-wide project to enhance our policies and procedures for managing customer risks. If FSRA still proceeds with a pilot project for the accreditation program before the supervision guidance comes into effect on March 1, 2026, we would like to participate. In the meantime, we would be pleased to discuss our feedback further at FSRA's convenience.

Sincerely,

Edward Lam
Vice-President, Personal Insurance Pricing

DEFINITY INSURANCE COMPANY, HEAD OFFICE

111 Westmount Road South, P.O. Box 2000, Waterloo ON Canada N2J 4S4

T 519.570.8200 | T VOICEMAIL 519.570.8500 | F 519.570.8389

definityinsurance.com