

Comments from CAC Received June 7, 2022

**From:** Y Hunter <[Yvonne.r.hunter@cox.net](mailto:Yvonne.r.hunter@cox.net)>  
**Sent:** Tuesday, June 7, 2022 3:58 PM  
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**Subject:** Governance Committee Request for Comments: Position Statement 1-2022  
**Importance:** High

Dear Karen,

On behalf of the CAC, we ask that the following comment be added to the record regarding the Positions Statement 1-2022. Please let us know if there are any additional questions regarding the comment.

"The Interstate Insurance Product Regulatory Commission ("IIPRC") Consumer Advisory Committee ("CAC") supports Position Statement 1-2022. More generally, the CAC agrees with the IIPRC assertion that its standards are proper under state constitutional law governing legislative delegation of authority to an interstate administrative agency, regardless of the issue addressed in Position Statement 1-2022.

The case law governing delegation of legislative authority and Position Statement I-2022 persuasively support the constitutionality of IIPRC standards in member jurisdictions. The CAC encourages the IIPRC to explore any other avenues available to further reinforce this conclusion. The CAC is prepared to participate in discussion of other strategies the IIPRC may consider addressing this matter."

Y Hunter

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