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February 10, 2025

Oregon State Legislature House of Representatives Committee on Commerce and Consumer Protection 900 Court St., NE Salem, OR 97301

Re: House Bill 2128

Dear Committee Members:

We are writing on behalf of the U.S. Travel Insurance Association ("UStiA") and the American Property Casualty Insurance Association ("APCIA") in support of House Bill 2128, a comprehensive bill that includes provisions governing how travel insurance is regulated in Oregon. UStiA and APCIA also support forthcoming amendments that will better align HB 2128 with the National Association of Insurance Commissioners ("NAIC") Travel Insurance Model Act.

UStiA is the national association of the travel insurance industry. Its members include insurance carriers, third-party administrators, insurance agencies, and related businesses involved in the development, administration, and marketing of travel insurance and travel assistance products.

APCIA is the primary national trade association for home, auto, and business insurers. APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers, with a legacy dating back 150 years. APCIA members represent all sizes, structures, and regions—protecting families, communities, and businesses in the U.S. and across the globe.

By enacting legislation that closely tracks the Travel Insurance Model Act, a version of which was approved by the National Council of Insurance Legislators in 2017 and the NAIC in 2018, Oregon would join most states—37 and counting—incorporating into their statutes a uniform and workable regulatory regime for travel insurance sales. This important legislation builds upon existing regulatory frameworks and distinguishes between insurance and non-insurance elements of travel protection plans in establishing the proper scope and reach of the regulatory framework.

HB 2128 has been thoroughly vetted to ensure the legislation that appears before you creates an efficient, effective regulatory framework for travel insurance that protects consumers, empowers regulators, and ensures the marketplace operates fairly.

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For these reasons, UStiA and APCIA support HB 2128 and urge the Committee to pass the bill. Thank you so much for your consideration.

Sincerely,

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H. Michael Byrne Counsel, UStiA

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McDermott Will & Emery