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Commercial businesses register under multiple names, insured under one policy.	Complete affidavit identifying all commercial fleet VINS and registered names.	Statistically, the Commercial insured is not the uninsured. 21 states of the 35 states using electronic verifications do not require commercial insureds to participate in the programs. Those states do not have a Commercial uninsured issue. **2/2/11 Additional Insurer Comments:** We believe that moving forward with full commercial reporting will continue to cause problems with the integrity of the program. Should legislative change be needed to move forward with either of the following options, the insurer community would support same. There is currently an insurance bill that may be the perfect place to introduce this change, AB74 which was introduced in the Assembly on Dec. 15, 2010 and is scheduled to be on the agenda for the opening 2011 session beginning 2/7/11. One of two changes are being proposed at this time: *Full Commercial Exception*- As noted above, a considerable number of states do not have a commercial program and have experience no issues with commercially insured business. Many identify it up front at the time of vehicle registration and mark their records that the vehicle is commercially insured. Use of ID Cards that specify that the vehicle is commercially insured also applies. While the UM statistics in many states are high, it has been determined in many states that the rate is primarily due to personal vehicles. The issue of illegal immigrant use is also a considerable component and many states are trying to find ways to address this. New York, when questioned on their rate, performed a study and found that of all the commercially insured	The DMV has requested statistics from the Office of Traffic Safety to help Nevada properly assess and address this issue. One claim from an uninsured commercial insured poses potential liability for the State and our citizens. To assist us in making an appropriate determination for Nevada, the DMV would be interested in any research or historical data the insurance industry can provide to support this recommendation. **February 25, 2011** This issue is a policy decision that must be made by the Nevada Legislature. Nevada DMV will continue validating insurance on all registered vehicles.

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		vehicles on their registration database, 99.85% of that population had active insurance coverage. The DMV confirmed that their UM rate is primarily driven by personally owned vehicles. The industry believes that this scenario would be consistent among all states and suggests that specific commercial vs personal stats be tracked going forward to verify this. ***Partial Commercial Exception*** - carriers reporting only those commercial policies where the vehicle count is 4 or less. With the current NV definition of fleet being set at 10, we are unable to endorse the standard "fleet" terminology the industry typically uses. Policies covering 4 or less vehicles would have sufficient information in order to validate coverage, such as policy # and full vehicle detail.	
Insurers often refer to these policy vehicles as fleet vehicles, they may or may not register as fleets.		Including Commercial businesses as mandatory is costing the state, the insured, and the insurance company's unnecessary costs of operation, with no real gain in reducing uninsured motorists. **2/2/11 Additional Insurer Comments**: It would be beneficial to the industry to see evidence of insurance lapses. Standard industry practice does not typically involve keeping a policy active with a lapse in coverage during the term. Either a policy is reinstated with no lapse, or it is cancelled, with possibly a new policy (with different policy number) issued if the insurer agrees to resume coverage but the effective dates would differ from the prior policy. This would not be considered a reissue, renewal or reinstatement.	While this statement may be true of large commercial businesses such as FedEx or UPS, we are unaware of any reports or historical data to support this statement. Nevada must also consider the smaller commercial businesses such as local plumbing companies, landscapers, etc. Exempting all commercial businesses from insurance verification leaves the State open to potential liability. The DMV also cannot discriminate on whether or not insurance will be validated based on company size alone. The DMV knows there are and have been lapses in coverage for commercial businesses. **February 25, 2011**

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			This may be the practice with a few insurance companies but is not the general rule for all. The Nevada LIVE team has been collecting data showing the policy numbers do not change after a lapse in coverage.
Commercial Insurance Carriers do not collect vehicle information for these types of policies.		Recommend voluntary participation of Commercial Insurers. **2/2/11 Additional Insurer Comments**: This recommendation would only apply in the event that commercial is exempted.	In accordance with the Nevada LIVE Insurance Company Guidelines, the DMV sends the VIN, NAIC, policy number, dates to confirm, registered owner name, and the driver's license number or FEIN, for each query. It is up to the insurance company to use any or all of these values to confirm or unconfirm coverage in accordance with the IICMVA Guidelines. **February 25, 2011** When all insurance companies are web services, then each company may determine which elements they will use to confirm coverage.
		Making FEIN an optional request versus a mandatory requirement. **2/2/11 Additional Insurer Comments**: Policy number was recommended as the primary matching element for reasons exactly like this. FEIN is not always provided (many insureds will not provide proprietary information they believe we do not need) or available to insurers and given the large number of insureds covered under a single policy, this equates to a significant number of different FEIN's per policy. Matching a vehicle to a	FEIN is only required for non-vehicle specific policies because the VIN is not available and name is not the primary matching item. Please see concerns and possible solution above. The DMV would like to know why carriers are unable to obtain the FEIN in order to assist the registered owners. **February 25, 2011** When all insurance companies are web services, then each company

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		specific FEIN is not accurate and insurers encounter great difficulty getting that information. Again, rather than cause the constituents of the state continued problems, it is best to exempt the non-vehicle specific policies from the reporting requirement.	may determine which elements they will use to confirm coverage.
Insureds are being suspended if the name is essentially correct but the corporate type abbreviations are left off. (i.e. LLC or Inc.)	State is looking for an exact match.	Recommend working with the State to find an alternative solution that better fits the Insured needs while still meeting State requirements. (The matching accuracy will greatly improve if "policyholder" (as it appears on the ID Card presented) is used rather than registered owner.) **2/2/11 Additional Insurer Comments:** The insurer group continues to recommend using "policyholder" if commercial is to remain included in this program. In effect, "policyholder" replaces "registered owner" and increases the chance of a match.	The DMV does not use or collect "policyholder" information. In accordance with the Nevada LIVE Insurance Company Guidelines, the DMV sends the VIN, NAIC, policy number, dates to confirm, registered owner name, and the driver's license number or FEIN, for each query. It is up to the insurance company to use any or all of these values to confirm or unconfirm coverage using the IICMVA Guidelines. **February 25, 2011** When all insurance companies are web services, then each company may determine which elements they will use to confirm coverage.
• **Verification of coverage- Query Frequency (Added 2/2/11)**		Carriers are receiving a substantial number of queries on a daily basis that would appear to be unnecessary to the industry, sometimes reaching hundreds of thousands per day. Multiple queries per vin are being received for essentially the same purpose, to confirm coverage. These queries are stacking upon each other and there does not appear to be a valid reason for the high number of queries per vehicle/policy. Prior discussion on query frequency indicated that the multiple verification queries are being done to	**February 25, 2011** In February 2011, programming was changed to only check two dates for an insurance policy. Those dates are the last confirm date and current date. In March 2011, the programming will consolidate the duplicate insurance records attached to a vehicle registration. With fewer insurance records, there will be

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		address billing cycle changes where a coverage lapse might occur. We were also advised that the multiple queries were caused by insurers, insured's and brokers usage of the website by sending more than one transaction in their activities. Our research has not indicated that to be at the level of duplicate queries the industry is receiving which indicates there must be more involved to be causing the large number of queries. We believe further discussion on this matter should be encouraged in the hopes of arriving at a more equitable solution than continuing to trigger the enormous number of queries now being sent.	fewer queries.
• **Unknown Carrier Query (Added 2/2/11)**		New category is being added as a result of further discussion of issues among the insurers in the group. We believe that the time is right to introduce this facet into the program. Using this type of query would greatly reduce the number of postcards being sent to Nevada residents and increase the timeliness and accuracy of an insurance confirmation from the current method. We wish to open this topic up for further discussion.	**February 25, 2011** On February 14, 2011, the Unknown Carrier Query process began. Currently, there are 26 NAICs receiving the UCQ. When an insurance company responds with a VIN3 or 10 unconfirmed reason codes they are given a link to add the NAIC, policy number, effective and termination dates to the VIN given in the UCQ. The information is updated then queried immediately with the insurance information received from the insurance company's submission.