



**Insurance Services Office, Inc.**  
101 Burr Ridge Pkwy.  
Suite 300  
Burr Ridge, IL 60527-0846  
www.iso.com

**Lynn M. Knauf, CPCU, ARM**  
Assistant Regional Manager  
Government Relations  
t 630.288.2013  
f 630-320-1799  
lknauf@iso.com

October 31, 2019

Director of Regulatory Affairs  
Maryland Insurance Administration  
200 St. Paul Place, Suite 2700  
Baltimore, Maryland 21202

Attn: Lisa Larson

Re: Surplus Lines placement of flood coverage – Draft proposed amendment to 31.03.06

Dear Ms. Larson:

Thank you for the opportunity for Insurance Services Office, Inc. (ISO) to provide comments on the draft proposed amendment to 31.03.06 being considered by the Department. For you to best understand our perspective, please note that ISO provides information, including statistics, underwriting and claims information, actuarial analyses, policy language, and consulting and technical services in connection with multiple lines of property/casualty insurance, as well as information about specific properties. Our customers include insurers and reinsurers, as well as agents, brokers, self-insureds, risk managers, financial-services firms, regulators, and various government agencies.

In order to better recognize and promote a truly robust private flood market in Maryland, we recommend the following change to the draft proposed amendment to 31.03.06 (using [ ] to denote deletions and underlines to denote additions):

Title 31 MARYLAND INSURANCE ADMINISTRATION  
Subtitle 03 INSURANCE PRODUCERS AND OTHER INSURANCE PROFESSIONALS  
Chapter 06 Surplus Lines  
Authority: Insurance Article, §§2-109, 3-304, 3-306--3-308, 3-311--3-313, 3-316, 3-325(c),9-301(f), 9-303(5), 9-401(j)(l) and(-2), 9-405(b),and 27-216, Annotated Code of Maryland

.10 Surplus Lines Exportable List.

A. - B. (text unchanged)

C. The surplus lines exportable list is as follows:

(1) - (23) (text unchanged)

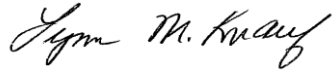
(24) Flood and water damage - excess of federal flood programs or primary *coverage that provides [at least the same], as a whole, similar coverage as available federal flood insurance;*

[where a federal flood program is not available;]

(25) - (50) (text unchanged)

We respectfully request the Department consider the proposed language. Again, thank you for the opportunity to share our comments with you regarding the draft proposed amendment. Please feel free to contact me should you require additional information concerning ISO's position relative to these matters.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Lynn M. Knaf". The signature is written in a cursive style with a large initial "L".

Lynn M. Knaf

LMK