

Mr Jim Hall
Consultant
Saskatchewan Financial Services Commission
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October 23, 2012

Dear Mr Hall,

I am writing to you in regard to the review of the *Saskatchewan Insurance Act*. We understand that you are coordinating the Insurance Act revision and will accept comments from industry. CAFII has been involved with other provinces in the review of Insurance Acts and would appreciate the opportunity to consult with Saskatchewan throughout the review process.

As initial input, we recommend that Saskatchewan harmonize the Insurance Act, particularly the life, Accident & Sickness and General insurance sections, to those provinces that have revised their insurance legislation. Manitoba has been through the process most recently.

CAFII is also concerned with electronic commerce. It is important to our members to be able to offer electronic distribution options to clients. We note that Saskatchewan was a leader in introducing *The Electronic Information and Documents Act* which creates equivalent treatment of electronic and paper documents. We support this direction in order to be able to allow clients to transact in their channel of choice, which is increasingly becoming telephone and Internet based. We recommend that Saskatchewan not include any exemptions in the Insurance Act from the Electronic Commerce legislation which would prescribe communication in writing. We have asked other provinces to specifically clarify that beneficiary designation can be electronic or verbal, to give certainty in the payment of claims. We also recommend that termination of insurance also be permitted electronically. Other provinces such as Alberta and British Columbia have called for terminations initiated by the insurer be in writing.

We further recommend in planning for implementation of a revised Insurance Act and regulations, that industry be given sufficient time. Ideally, companies require 12 – 18 months from the time regulations are finalized to implement changes. Insurance Act changes are major projects requiring systems changes, document updates, training and customer notifications. We would appreciate it if you could take this into account when developing your timeline.

CAFII would be pleased to work with you and be involved in consultations as you proceed with the Insurance Act revision process. Please feel free to contact me in this regard.

Yours truly,

Jennifer Hines
Chair, CAFII Executive Operations Committee