

Alaska State Legislature
House Committee on Judiciary

January 26, 2026

Submitted electronically to: House.Judiciary@akleg.gov

RE: HB 20, Prohibit Fees for Paper Documents - NAMIC's Written Testimony

Thank you for affording the National Association of Mutual Insurance Companies (NAMIC) an opportunity to submit written testimony to the House Committee on Judiciary for the public hearing on HB 20, Prohibit Fees for Paper Documents.

The National Association of Mutual Insurance Companies (NAMIC) is the foremost trade association representing the property/casualty insurance industry. Serving more than 1,300 member companies - including local and regional insurers as well as some of the nation's largest carriers - NAMIC members collectively write \$467 billion in annual premiums, representing 61% of the homeowners and 53% of the automobile insurance markets. For more than 130 years, NAMIC has been the leading voice advancing public policy solutions and regulatory frameworks that promote a strong, competitive market and protect our members and their policyholders.

Although we appreciate the bill sponsor's laudable desire to keep costs down for insurance consumers who want paper copies of documents, NAMIC is concerned that the proposed legislation will be an insurance rate cost-driver and will create a regulatory problem for insurers who offer consumers a discount for opting for the more cost-effective electronic documents. Electronic documents save insurers, and ultimately consumers, the cost of insurers creating and mailing paper documents. This may seem like a small dollar amount, but in the aggregate, it is quite significant.

In today's modern world, most consumers want electronic documents, which are quicker to access, easier to print out at home on one's own computer and printer, and more efficiently saved for future reference as a computer file. Most insurers have moved to this medium, because it is what the vast majority of consumers want and because it helps insurers keep administration costs down, an expense that is ultimately passed on to the consumer in their rates.

Insurers want their policyholders to be informed consumers, so insurers regularly work with their policyholders to assist them in securing access to their insurance documents, and often provide complimentary paper copies of insurance documents to their consumers who have an emergency need or who have experienced a loss of power or internet access.

NAMIC doesn't see a public policy problem with insurers offering, if they decide, discounts to consumers who opt for the most cost-effective e-documents and/or requiring consumers to pay for the cost of paper documents being sent to them when the document is readily available via computer or mobile device. Insurers are committed to being cost conscious in their business practices to do their part in promoting affordable insurance for consumers, so implementing cost-efficient processes, like e-delivery of documents, is most appropriate. Further, offering a discount to consumers who opt for e-delivery, i.e. sharing the administrative cost savings with the consumer, and/or requiring those who want a special service to pay for the special service, instead of passing that cost onto the aggregate of insurance consumers, makes sense and is fair for all.

Thank you for your time and consideration. Please feel free to contact me at [REDACTED] or at [REDACTED] if you would like to discuss NAMIC's written testimony.

Respectfully,



Christian John Rataj, Esq.
NAMIC Senior Regional Vice President
State Government Affairs, Western Region



ELECTRONIC MAIL

January 28, 2026

Representative Andrew Gray, Chair
House Judiciary Committee
120 4th St., Room 3
Juneau, AK 99801

Re: Opposition to HB 20 – Prohibit Fees for Paper Documents

Dear Representative Gray and members of the House Judiciary Committee:

On behalf of the Alaska Bankers Association (AKBA), which represents state and national banks serving communities throughout Alaska, we respectfully submit this letter in opposition to HB 20.

While AKBA supports consumer choice and transparency, HB 20's blanket prohibition on charging fees for paper statements and documents raises significant concerns related to cost allocation, regulatory overreach, operational burden, and unintended consequences for both consumers and financial institutions.

Providing paper statements and documents carries real and increasing costs, including printing, postage, materials, vendor services, data security, and staff time. HB 20 prevents banks from recovering those costs directly from customers who elect paper delivery, instead forcing institutions to absorb or redistribute them. As a result, customers who choose electronic delivery—or who rely on low-cost accounts—would subsidize the higher costs associated with paper delivery. This undermines basic principles of cost causation and fair pricing and may ultimately lead to higher fees or reduced services for all customers.

Financial institutions have made substantial investments to encourage electronic delivery of statements and disclosures, consistent with environmental sustainability goals and consumer preferences. HB 20 removes a lawful and widely used incentive structure that supports reduced paper usage, increased efficiency, and lower environmental impact. By prohibiting differentiated pricing, HB 20 may unintentionally slow or reverse progress toward environmentally responsible business practices.

Banks operate under extensive federal regulation governing disclosures, statements, and consumer consent for electronic delivery, including the federal E-SIGN Act, Truth in Lending

Act, Truth in Savings Act, and related regulations. HB 20 creates the potential for conflict or inconsistency with these federal frameworks by regulating how delivery choices are priced, rather than focusing on disclosure adequacy or consumer consent. This raises questions of federal preemption and legal uncertainty.

For national banks operating in Alaska, HB 20 may also limit the availability of certain account types and bundled service offerings. National banks commonly design products on a nationwide basis, bundling services and pricing structures to achieve efficiency, consistency, and affordability across markets. State-specific restrictions that prohibit cost-based pricing for particular delivery options can disrupt these models and make it impractical to offer certain accounts or services in a market subject to unique regulatory constraints. As a result, national banks may respond by narrowing the range of account options available in Alaska, restructuring products in ways that reduce consumer choice, or declining to offer certain low-cost or bundled accounts altogether.

HB 20 applies not only to monthly statements but broadly to any “statement, invoice, notice, or other document,” regardless of frequency, volume, or cost. This includes loan documents, compliance notices, and specialized disclosures that may require customized handling or third-party services. A one-size-fits-all prohibition does not reflect the wide range of documents banks are required to produce or the varying costs associated with them.

Current Alaska law already prohibits deceptive or unfair trade practices and requires clear disclosure of fees. Consumers are informed upfront about statement delivery options and any associated costs, and they retain the ability to switch to electronic delivery at any time. HB 20 does not address deceptive conduct; instead, it prohibits a transparent and voluntary pricing practice that consumers can avoid entirely by choosing electronic delivery.

AKBA respectfully urges the Committee to oppose HB 20’s broad prohibition given existing consumer protections, federal regulatory frameworks, and the real costs associated with paper delivery.

Thank you,

A handwritten signature in blue ink, consisting of a stylized initial 'S' followed by a long horizontal stroke that tapers to the right.

Sam Mazzeo, President
Alaska Bankers Association