



ELECTRONIC MAIL

March 17, 2026

Senator Matt Claman, Chair
Senate Judiciary Committee
120 4th St., Room 3
Juneau, AK 99801

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

Dear Senator Claman and members of the Senate 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. For national banks in particular, this raises questions of federal preemption and legal uncertainty that could result in litigation rather than consumer benefit.

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

March 18, 2026

The Honorable Matt Claman
and Alaska Senate Judiciary Committee
Alaska State Capitol
120 4th Street
Juneau, Alaska 99801

RE: House Bill 20 Prohibit Fees for Paper Documents Concerns

Chair Claman and members of the Senate Judiciary Committee:

The American Property Casualty Insurance Association (APCIA), representing 64 percent of Alaska’s property/casualty insurance market, promotes and protects the viability of private competition for the benefit of consumers and insurers, with a legacy dating back 150 years. APCIA members provide protection for families, communities, and businesses in Alaska, throughout the U.S., and across the globe.

APCIA has concerns with House Bill 20 (HB 20), which would prohibit insurers and other businesses from charging fees for providing paper documents such as statements, invoices, and notices. While well intentioned, this measure would result in operational, financial, and regulatory concerns for entities that utilize and rely on efficient, modernized communication processes. Many insurers offer discounts to customers that opt to receive documents via electronic delivery. Such practices allow many consumers to benefit from the reduced costs of producing and mailing paper documents.

Of significant concern, HB 20 would also classify violations of what would be the new requirement as unfair trade practices, expanding legal and compliance risk.

Concerns with HB 20:

1. Increased Administrative and Compliance Costs

Requiring free paper documentation ignores the real operational expenses involved in printing, mailing, and processing physical correspondence. As described in the bill summary, HB 20 applies broadly to insurers and general businesses, who must supply paper copies at the same cost as electronic versions. This would be particularly burdensome for companies serving large customer bases or operating in remote regions where mail service is slower and more expensive.

2. Disincentivizing Digital Adoption

In recent years, Alaska businesses and consumers have increasingly adopted electronic document delivery

for convenience, security, and cost savings. By requiring businesses to absorb the full cost of paper delivery, HB 20 could unintentionally discourage digital participation and stall modernization efforts.

3. Broad Liability Through “Unfair Trade Practices” Provisions

HB 20 ties enforcement to Alaska’s unfair trade practices statutes, exposing businesses to heightened penalties and litigation risk for minor or inadvertent compliance issues. This punitive framework is disproportionate to the administrative nature of the underlying requirement.

The bill, as drafted, imposes undue burdens on businesses, undermines digital modernization, and expands legal risk in ways that are not proportional to the issue at hand. Thank you for your consideration. I welcome the opportunity to discuss these concerns further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Laura Curtis", is placed on a light-colored rectangular background.

Laura Curtis
Assistant Vice President, State Government Relations



March 20, 2026

Senator Matt Claman, Chair
Senate Judiciary Committee

Re: House Bill 20, Prohibit Fees for Paper Documents (version 34-LS0237\I)

Dear Chair Claman, and members of the Senate Judiciary Committee,

The Alaska Chamber (the Chamber) writes to express concerns with House Bill 20, an Act relating to fees for paper documents; relating to unfair trade practices; and providing for an effective date.

The Alaska Chamber is the state's largest statewide business advocacy organization. Our mission is to promote a healthy business environment in Alaska. The Chamber has more than 700 members and represents businesses of all sizes and industries from across the state, representing 58,000 Alaskan workers and \$4.6 billion in wages.

While we support the goal of consumer protections and equitable access, we are concerned that the bill could impose broad new mandates on businesses, particularly in industries that are already highly regulated. House Bill 20 would increase compliance costs for businesses by introducing new administrative requirements, including provisions related to paper document fees and expanded unfair trade practice claims. These added obligations would be particularly burdensome for small and mid-sized businesses that operate with limited staff and tight margins. Additionally, the bill creates regulatory uncertainty around how these provisions would be defined, implemented, and enforced, making long-term planning more difficult for employers considering investment or expansion in Alaska.

We are also concerned that expanding categories under unfair trade practices could unintentionally increase litigation risk for businesses already navigating a complex regulatory environment. Even the possibility of additional liability can discourage economic activity and have negative ripple effects on hiring, wages, and service availability across local economies.

For these reasons, the Alaska Chamber respectfully urges you to reconsider House Bill 20 and instead work with Alaska's business community to identify balanced approaches that protect consumers without creating unnecessary barriers to economic stability and growth.

Thank you for your consideration of the Chamber's comments on this bill.

Sincerely,

A handwritten signature in black ink that reads 'Kati Capozzi'.

Kati Capozzi
President and CEO



2550 Denali Street, Suite 530
Anchorage, AK 99503



Office (907) 278-2722



www.alaskachamber.com
info@alaskachamber.com

Alaska Independent Insurance Agents & Brokers, Inc.

Leslie Binkely – Executive Director
Katie Eddy - President

March 18, 2026

The Honorable Matt Claman
Alaska State Legislature
State Capitol
Juneau, Alaska 99801

RE: Concerns Regarding House Bill 20 – Paper Document Fees

Dear Senator Claman,

On behalf of Alaska Independent Agents & Brokers, Inc. representing independent insurance agencies, professionals and carriers serving Alaskans, I am writing to express our **opposition** to **House Bill 20**. While we support transparency and fair treatment of consumers, HB 20 as currently drafted creates significant operational burdens and ignores the actual costs associated with maintaining antiquated paper-based systems in an increasingly digital regulatory environment.

Our opposition is based on the following key points:

- **Cost Shifting to All Policyholders:** Providing paper statements, invoices and notices involves real and unavoidable costs, including printing, equipment, and postage. If discounts for electronic delivery are prohibited, these costs do not disappear – they must be reflected in overall pricing. This results in higher costs being shared across all policyholders, regardless of their preferred method of delivery.
- **Conflict with Modernization Efforts:** The insurance industry and the **Alaska Division of Insurance** have made significant strides in moving toward electronic correspondence to increase efficiency and reduce environmental impact. HB 20 creates a "one-size-fits-all" mandate that discourages the transition to more secure, immediate, and cost-effective digital delivery methods.
- **Operational Interference:** Administrative fees for paper documents are often used to offset the specialized manual handling required for physical mailings. Under Section 1 of the bill (amending AS 21.36), insurers would be prohibited from charging "a different



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rate" based on document delivery. This prevents carriers from offering **discounts** to consumers who opt into paperless billing—a common practice that rewards efficiency and lowers costs for the public.

- **Redundancy with Existing Protections:** Alaska already has robust **unfair trade practice** laws and Division of Insurance oversight to prevent predatory fee structures. Prohibiting cost-recovery fees for a specific service like paper delivery is an unnecessary legislative overstep into standard business operations.

We believe that consumers should have choices, but those choices should reflect the actual cost of the service provided. We urge the Committee to **vote "No"** on House Bill 20 to protect the stability of insurance rates and support continued industry modernization.

Thank you,



Leslie R. Binkley
Executive Director
Alaska Independent Agents and Brokers, Inc.
907-349-2500
ExecutiveDirector@aiiab.org

Alaska State Legislature
Senate Committee on Judiciary

March 24, 2026

Submitted electronically to

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 Senate 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 303.907.0587 or at crataj@namic.org, if you would like to discuss NAMIC's written testimony.

Respectfully,

A handwritten signature in black ink, appearing to read "Christian John Rataj". The signature is fluid and cursive, with a large initial "C" and "R".

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