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Alaska State Legislature
House Committee on Judiciary

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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,



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