April 25, 2017

The Honorable Jeb Hensarling
Chairman
Committee on Financial Services
U.S. House of Representatives
2129 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Hensarling:

The Property Casualty Insurers Association of America (PCI) commends you for seeking to address many of the shortcomings of the Dodd-Frank Act by proposing the Financial CHOICE Act of 2017 (“CHOICE Act”). PCI supports the CHOICE Act and pledges to continue to work with you and members of the Financial Service Committee to ensure that any federal laws impacting the insurance marketplace are tailored to our industry and appropriately recognize the strengths of the state insurance regulatory system.

CHOICE Act provisions that PCI strongly supports include (but are not limited to):

- Eliminating the Federal Insurance Office (FIO) and limiting its domestic activities while preserving its international role merged together with FSOC’s independent insurance expert in the Independent Insurance Advocate’s office.
- Subjecting the Financial Stability Oversight Council’s (FSOC) funding to the appropriations process and reforming FSOC’s authority to designate firms as systemically important financial institutions.
- Requiring greater transparency in the federal agencies’ participation in international insurance standard setting negotiations.
- Requiring federal financial regulators to conduct a cost-benefit analysis before issuing rules.
- Increasing the accountability of the Consumer Financial Protection Bureau (CFPB), including repealing CFPB’s authority to ban financial products it finds “abusive.”
- Eliminating the *Chevron* deference doctrine requiring the courts to defer to agency interpretations in judicial review of federal financial agencies’ rules.

PCI has suggested additional strengthening amendments that we have included in our statement for the April 26, 2017, hearing record. Thank you for your leadership in seeking to address many of the challenges arising from the Dodd-Frank Act, particularly for insurers, and we look forward to continuing to work constructively with you and your staff to improve and move forward this important legislation.

Sincerely,

Nathaniel F. Wienecke

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