



September 29, 2017

Mr. Rob Tanaka,  
Director, Policy and Finance  
Insurance Council of British Columbia  
Suite 300, 1040 W Georgia St  
Vancouver, BC, V6E 4H1

[rules@insurancecouncilofbc.com](mailto:rules@insurancecouncilofbc.com)

Dear Mr. Tanaka,

**Re: Proposed Increase of Insurance Council of British Columbia's Fee Limits**

The Canadian Association of Direct Relationship Insurers is the voice of insurance enterprises that offer automobile, home and commercial insurance directly to Canadians. We advocate for flexible and evolving regulatory and legislative frameworks governing automobile, property and commercial insurance to enable product and service innovation so that Canadians can easily choose insurance that serves their needs through the delivery channels of their choice.

CADRI appreciates the opportunity to provide comments on the Council's proposal to increase the upper limits for application, annual filing, exam and late filing fees.

CADRI understands that the Council is financed by fees charged to insurance companies, and that revenues are restricted by the need to limit company assessments to 10-times the Council's application fee which is currently capped at \$200. In addition, the Council has stated that fees have not increased since 2006.

CADRI supports policy changes which lead to a more efficient agency, with improved digital systems, and faster response times. Consumers benefit when insurance companies are able to quickly and efficiently renew agents' licences and ensure that experienced, trained individuals are available to respond to customers' inquiries.

However, CADRI's members employ hundreds of individuals who provide customer service to policy holders in British Columbia. Therefore, the fee increases proposed, if implemented immediately and to the upper limit, would have a significant impact on these insurance companies' planning and operations. For this reason, CADRI recommends that fee increases, if any, be implemented on a gradual basis over a number of years.

Response to Insurance Council of BC proposal to raise fees

CADRI appreciates the opportunity to submit comments on the proposals to increase the upper limits for fees at the Council. We welcome your questions on our experience with the Council, and the impact of fee increases on our members and their customers.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alain Thibault', written in a cursive style.

Alain Thibault  
Chair and CEO, CADRI

**cc:**

CADRI Board of Directors  
CADRI Licensing Task Force  
CADRI Western Committee