# EXAM 6 - CANADA, FALL 2015

# 3. (2 points)

In September 2013, the Financial Services Commission of Ontario (FSCO) published a Usage-Based Insurance Pricing (UBIP) bulletin that outlines additional considerations and requirements for automobile insurance filings that contain a UBIP component.

# a. (1 point)

Identify four elements of the bulletin that demonstrate FSCO's emphasis on transparency to the consumer.

## b. (1 point)

Describe two ways the bulletin promotes a competitive Usage-Based Insurance marketplace.

#### **EXAM 6-CANADA SAMPLE ANSWERS AND EXAMINER'S REPORT**

QUESTION 3	
TOTAL POINT VALUE: 2	LEARNING OBJECTIVE: A2
SAMPLE ANSWERS	

### Part a: 1 point

Any four of the following received full credit:

- Recorded measure used in pricing process
- Historical information is trackable by insured
- Need to explain every time the rating program to the client
- The customer should know how to be eligible for discount and max min possible and the insurer should give regular feedback
- The customer should have access to his telematics data
- The insurer should have consent of use personal data and detail how the personal will be use in the UBIP model
- Insurer must disclose the purpose of collecting telematics data
- Insurer must disclose how much discount is given due to usage based pricing
- Insurers must inform consumers about what personal information is being collected.
- Insurers must inform consumers about who may have access to personal information/the circumstances under which personal information could be disclosed to other parties.
- Insurers must inform consumers about how personal information is being used.
- Insurers must inform consumers about their rights with respect to their personal information.
- Insurers must inform consumers of any changes to how personal information is collected, used or disclosed.
- Insurers must clearly communicate the rating model (how to qualify for a discount, maximum/minimum discount, period being measured to calculate the discount) to the consumer at all times, beginning prior to enrollment and continuing through policy renewal.
- Insurers should provide regular feedback on the driving performance of the consumer.
- Insurers must disclose the impact of other operators of the vehicle on the calculated UBI discount.
- Consumers should be able to access the data on which their discount is based, and be given opportunities to correct any inaccuracies.
- Insurers may be required to make policyholders aware that an affiliated insurer is offering a UBI program with a discount, per UDAP.
- Must keep track of consent
- Use and disclosure of the information + which circumstances disclose to 3<sup>rd</sup> parties
- For what period data will be used
- Require proper customer service must be in place to answer questions, take complains

#### Part b: 1 point

Any two of the following received full credit:

- Insurer must facilitate transfer of an insured's telematics data to another insurer
- Insurers should, where possible, facilitate drivers using their personal UBIP data for the purposes of entering into a contract with another insurer, including enrolling in another insurer's UBI program.

#### **EXAM 6-CANADA SAMPLE ANSWERS AND EXAMINER'S REPORT**

- This guideline advocates for the portability of data that is needed for drivers to transfer their UBI data to other insurers in search of a lower premium and/or better value-added services.
- FSCO is willing to review data and the amount of discount charged in other jurisdictions, even if there is no Ontario-specific data to support a filing.
- This guideline reduces barriers to entry for insurers to enter the UBI marketplace, as they do not have to run an Ontario pilot program to gather Ontario data before submitting a filing.
- Insurers are allowed to treat UBIP start-up costs as part of research and development and not specifically allocate them to the determination of UBI rates.
- This guideline allows insurers to keep UBI premiums low to attract new UBIP customers, rather than being mandated to load in additional expenses into UBI premiums.
- If data is not available immediately, proxy data can be used to analyse possible UBI pricing which would increase availability to insurer who lacks data
- Insurers should have the program available in all territories
- No limitations on discount structure and metrics collections resulting in a more competitive marketplace. Allows companies to be creative, innovate or similar.
- Insurers may be required to make policyholders aware that an affiliated insurer is offering a UBI program with a discount, per UDAP.
- Encourage open communication between industry & government body.

## **EXAMINER'S REPORT**

- The candidates are expected to know the FSCO UBI.
- The candidates did well in part a, but had difficulty in part b.
- The candidates need to understand the article to answer the question.

#### Part a

- The candidate was expected to identify four elements that demonstrate FSCO's emphasis on transparency to the customers.
- Any four elements related to transparency to customers will obtain full credit.
- Elements related to privacy were not accepted as it is not allowed under privacy law.
- Elements related to transparency to FSCO were not accepted as this is what the question is asking.

#### Part b

- The candidate was expected to describe two ways the bulletin promotes a competitive UBI marketplace.
- Many candidates did not understand "competitive marketplace".
- Some candidates mistook competitive marketplace for competitive pricing.
- "UBI can be used for discount only" was not accepted as UBI is not only offered as a discount.
- "UBI makes pricing more competitive" was not accepted as this is again just repeating the question.