



## Independent Insurance Agents of Rhode Island

July 28, 2017

Division Clerk  
Rhode Island Division of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick RI 02888

RE: 815-RICR-50-10-5 ERLID 8684

The Independent Insurance Agents of Rhode Island (IIARI) offer the following written comments to complement testimony previously provided at the public hearing held on July 19.

### Filing a Certificate of Insurance

IIARI is concerned about financial safety of the public and we strongly urge consideration to mandate filing a copy of a Certificate of Insurance with the DPUC in order to maintain a public record insurance carried by TNC drivers. The underlying concern:

- TNC use of “Non-Admitted Insurance Markets” which are not regulated by any state authority.
- Insurance limits mandated by law and carried on TNC drivers is significantly less than that required of other transportation options.
- Provides assurance to riders they will be able to determine TNC insurance company in the event of loss or injury.

### Notification Requirement to Vehicle Owner

As told by a TNC representative at the hearing, they believe that knowledge a TNC driver is either the “named insured” or an “insured” is a proxy to the owner being aware of the vehicle use. That is not the case nor is it reality. The TNC should be required to insure both the owner of the vehicle as well as the driver. TNCs should be required to provide “TNC and insurer disclosure requirements,” as mandated by the law, directly to the vehicle owner. The draft regulation allows for either and both should be required for the financial safety of the public.

### Supplemental Items

The number of accidents a TNC driver has should be directly tied to their ability to continue to provide service. An unlimited number of accidents should not be permitted for public safety concerns. Taxi drivers are not allowed to continue driving if they've had three accidents in 24 months. Similar standards should be codified for safety purposes.

Nineteen year old drivers are permitted to drive for a TNC and transport up to six passengers. For public safety, TNC drivers should be required to have a certain minimal amount of driving experience.

Respectfully submitted,

Ernest Shaghalian, CPCU, AAI  
Chair, IIARI Government Affairs Committee

Mark A. Male  
Executive Vice President