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February 1, 2017

Wyoming State Legislature
Senate House Transportation, Highways
and Military Affairs Committee

sent via electronic submission
to committee

RE: SF 170, Unmanned aircraft - NAMIC's written testimony IN OPPOSITION to legislation

Dear Senator Meier, Chair; and honorable members of the Senate Transportation, Highways and Military Affairs Committee:

Thank you for affording the National Association of Mutual Insurance Companies (NAMIC) an opportunity to submit written testimony to the House Corporations, Elections and Political Subdivisions Committee for the February 1, 2017, public hearing.

The National Association of Mutual Insurance Companies (NAMIC) is the largest property/casualty insurance trade association in the country, with more than 1,400 member companies. NAMIC supports regional and local mutual insurance companies on main streets across America and many of the country's largest national insurers. NAMIC members represent 40 percent of the total property/casualty insurance market, serve more than 170 million policyholders, and write nearly $225 billion in annual premiums. NAMIC has 119 members who write property/casualty in the State of Wyoming, which represents 42% of the insurance marketplace.

Thank you for providing NAMIC with an opportunity to submit written testimony on the proposed legislation. NAMIC believes that the proposed legislation unnecessarily intruded upon the Federal Aviation Administration's (FAA) plenary authority to regulate aircraft, including unmanned aircraft (UAS), in navigable airspace; would conflict with significant substantive provisions carefully debated, analyzed, and adopted by the FAA in their recent regulations; hinder the growing and beneficial use of unmanned aircraft by the public and business community; and would adversely impact insurers' ability to safely use modern technology (UAS) to assist them in addressing the insurance claims and underwriting needs of consumers in an administratively efficient, consumer convenient, and cost-effective manner.

NAMIC respectfully recommends that legislation pertaining to unmanned aircraft (UAS) be closely modeled after FAA regulations so that there is consistency and uniformity in regulatory requirements between state and federal law.

If this committee believes that this bill needs to move forward, NAMIC suggests that the proposed legislation be amended to allow for a business use exception to the bill, so as not to prevent the legitimate, beneficial, and pro-consumer use of drones by insurers in their efforts to assist policyholders in securing insurance products they have applied for with the insurer and in resolving insurance claims they have proactively filed with the carrier.

Proposed exception:

"The unmanned aerial vehicle is operated by a business entity doing business lawfully in this state, is operating the unmanned aerial vehicle for legitimate business purposes, and is operating the unmanned aerial vehicle in a manner consistent with applicable Federal Aviation Administration rules, licenses, or exceptions."

Thank you for your time and consideration. Please feel free to contact me at 303.907.0587 or at crataj@namic.org, if you would like to discuss NAMIC's written testimony.

Respectfully,

Christian John Rataj, Esq.
NAMIC – Senior Director of State Affairs
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