



Property Casualty Insurers

Association of America

Advocacy. Leadership. Results.

Stephen W. Broadie  
Vice President, Financial Policy

June 2, 2016

Robert deV. Frierson  
Secretary  
Board of Governors  
Federal Reserve Board  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551

RE: Request for Comment on Re-Proposed Joint Rules Implementing the Incentive Compensation Requirements of the Dodd-Frank Act

Dear Mr. Frierson:

The Property Casualty Insurers Association of America (PCI) intends to comment on the Notice of Proposed Rulemaking (NPRM) on the Re-Proposed Joint Rules Implementing the Incentive Compensation Requirements of the Dodd-Frank Act. The NPRM sets the comment deadline at July 22, 2016. PCI would like to request an extension of that deadline of at least one hundred twenty (120) additional days. PCI consists of nearly 1,000 member property/casualty insurers that write \$195 billion in annual premium, 35 percent of the nation's property/casualty insurance. Member companies write 42 percent of the U.S. automobile insurance market, 28 percent of the homeowners market, and 35 percent of the private workers compensation market.

The re-proposed rule is quite complex and involves a detailed analysis of definitions as well as an analysis of the proposed requirements applicable to three tiers of companies by asset size. As is often the case with proposed financial regulations at the federal and international level, the NPRM appears to be bank-centric in its focus, and we believe the Board would benefit from a detailed analysis of executive compensation practices in the insurance industry and how they differ from those that prevail in the banking industry. PCI and its members need adequate time to assess the impact of the NPRM on insurers in order to provide the most helpful and informed comments to the Board of Governors.

For the foregoing reasons, PCI strongly urges the Board to extend the comment deadline on the NPRM by 120 days beyond the current deadline of July 22, 2016.

Sincerely,

A handwritten signature in black ink that reads "Steph W Broadie". The signature is written in a cursive, flowing style.

Stephen W. Broadie