



Canadian State Farm Agents Association Inc

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Membership in Professional Associations should be required for all Agents/Brokers/Intermediaries. This would once and for all demonstrate to the Public that our government is serious about the training and competence of intermediaries. Self regulating Associations under the “watchful eye” of FSCO would be responsible for maintaining education and re-education programs for intermediaries as well as policing their activities. This effort would also reduce the need/work load for FSCO. Introduce Just-Cause legislation that would give a measure of security to intermediaries against unfair/illegal/immoral termination of agreement by insurers.

Whistle Blower Protection for those who expose unfair/illegal/immoral activities on the part of insurers/their representatives/management. At present, we are certain that there are activities- direct and indirect- which could be considered illegal, immoral, unethical by both insurers and intermediaries. Those who stand up and point these out end their careers accordingly.

Contrary to what RIBO would like you to believe, Agents are not** employees and hence their first obligation is to their Clients --- just like Brokers first obligation is to theirs.

Remove license sponsorship requirement as it is obsolete and it allows for undue influence over intermediaries by their sponsors. Our own Principal is

fond of using that threat whenever an Agent balks at coercion to sign a document that is not in their best interest.

Licensing of Agents/Brokers should be handled by one entity and that should be **the Ontario Insurance Commission**. Agents and Brokers licenses should be equal and allow for more flexibility in transitioning from one to the other. We have reviewed the open-book policy of the Brokers exam and find it is far inferior to that required of Agents by FSCO.

Disallow Credit-Scoring as a means of rate classification – rate increase justification- redlining.. Although it has been banned from use in the arena of auto insurance it is allowed for both personal lines and commercial lines fire...and is used regularly by some Insurers.

Create an advisory Board with actual powers to actually perform the functions of the stated “external consultation mechanisms” – not the sham it currently is. Make up of the Board to include: Agent rep, Broker rep, Insurer rep, Public rep, Adjuster rep, Medical rep, Politician.

Review of rating systems to ascertain if multi-car or multi-line discounts are fair or if they are unfair and in some cases discriminatory. Are rates artificially high so that in those situations insurers can “offer” a large discount which in reality is simply a return to the rate needed in the first place? Ie. Why do youthful drivers have their auto premiums reduced by \$400-800. per year if they have renters/homeowners or **life** insurance with an insurer.

We (CASFAA Inc.) are indeed disappointed that despite numerous letters and calls to officials we are not notified of desired submissions from ‘stakeholders’ and are, in fact, ignored. If the insurance regulators are indeed to demonstrate a desire to actually include all stakeholders in discussions of importance and merit to the insuring public, we can no longer be ignored...especially given our status as the only Federally registered Professional Agents Association representing Agents* in Canada.

Respectfully submitted by:

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Past President of CASFAA Inc.
Current Legislative Liason