



September 17, 2010

Robert J. Melillo, Chief  
Department of Banking and Insurance  
Legislative and Regulatory Affairs  
20 West State St.  
P.O. Box 325  
Trenton, NJ 08625-0325

**PROFESSIONAL  
INSURANCE  
AGENTS**

Dear Mr. Melillo:

On behalf of the Professional Insurance Agents of New Jersey Inc., I appreciate the opportunity to offer comment on proposed regulation 10-148.

The Professional Insurance Agents of New Jersey Inc. is a statewide trade association which represents more than 7,000 professional, independent insurance agents and their employees. Our member agents and brokers work in, and are members of, a wide range of communities across New Jersey with varying demographics, insurance-purchasing habits, insurance needs and risk profiles. Our members are aware of and work to serve the varied auto insurance needs of drivers in all localities—from rural and agricultural areas in Cumberland County, to inner cities such as Camden and Newark.

PIANJ has long supported measures to increase competition in the auto insurance marketplace, and believes that the department's efforts to further the deregulation of the auto insurance regime in New Jersey have proven generally positive for the majority of drivers in the state. PIANJ also is aware of ongoing concern that the current state of the auto insurance market still makes it difficult for some drivers in higher-risk territories to find affordable auto coverage in the private market, and the possibility that a program, like the Territorial Rate Equalization Exchange (TREE) would help to minimize this difficulty.

Balancing the considerations discussed above, PIANJ supports the Department of Banking and Insurance's proposal to repeal the regulations creating the TREE. However, PIANJ encourages the department to maintain an active and vigilant approach to monitoring market conditions, particularly in high-cost and urban areas, so that it can act decisively and rapidly should market conditions warrant department action to ensure the availability and affordability of auto insurance.

Sincerely,

A handwritten signature in black ink that reads 'Donna Cunningham'.

DONNA M. CUNNINGHAM, CPCU  
PIANJ President

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