



Representative Joseph J. Solomon, Jr., Chair
House Corporations Committee
Rhode Island General Assembly

February 11, 2026

Re: House Bill 7515 – Relating to Commercial Law – Deceptive Trade Practices - OPPOSE

Dear Chair Solomon and Distinguished Committee Members:

On behalf of the American Council of Life Insurers, thank you for the opportunity to comment in opposition to House Bill 7515, which would subject insurance claims to commercial law provisions governing unfair and deceptive practices and unfair and deceptive fees.

Life insurers and their products are highly and ably regulated by the Division of Insurance in all aspects of our business. The insurance code, specifically §27-9.1 (Unfair Claims Settlement Practices Act) and §27-29 (Unfair Competition and Practices) prohibit insurers from engaging in unfair claims practices and require insurers to clearly disclose fees to consumers and adhere to strict requirements regarding advertisements. The insurance superintendent also has extensive authority to conduct market conduct examinations and request information from insurers to confirm their adherence to the insurance code and corresponding regulations.

Subjecting life insurance transactions to commercial law prohibitions on unfair practices would be duplicative and inappropriate. It would also run counter to §6-13.1-4 of the commercial law, which provides that it shall not apply to transactions permitted under laws administered by the Department of Business Regulation.

Life insurers are committed to engaging in fair claims practices and truthful communications and providing valuable products that support Rhode Islanders' financial security. Neither insurers nor consumers would benefit from duplicitous oversight or inconsistent rules that may dilute the ability of the Division of Insurance to exercise strong oversight over insurance transactions. For these reasons, we respectfully request that you oppose H. 7515.

Please do not hesitate to contact me should you have any questions.

Respectfully submitted,

Jill Rickard
Regional Vice President, State Relations
202-624-2046 t
jillrickard@accli.com

American Council of Life Insurers | 101 Constitution Ave, NW, Suite 700 | Washington, DC 20001-2133

The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 280 member companies represent 94 percent of industry assets in the United States.

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