

The Honorable Robert Britto, Chair
Senate Commerce Committee
Rhode Island General Assembly

March 31, 2026

Re: Senate Bill 2204 – Relating to Commercial Law – Deceptive Trade Practices - OPPOSE

Dear Senator Britto and Distinguished Committee Members:

On behalf of the American Council of Life Insurers, thank you for the opportunity to comment in opposition to Senate Bill 2204, 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 S. 2204.

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

Respectfully submitted,



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