



**Charles P. Breitstadt**  
Director Of Government Affairs  
Government Relations

August 27, 2008

Sara L. Bamford  
Operations Manager  
Interstate Insurance Product Regulation Commission  
444 North Capitol Street, NW  
Hall of States Building  
Suite 701  
Washington, DC 20001

Re: Amendment to the rule for establishment of conditions and procedures for public inspection and copying of information and official records of the Interstate Insurance Product Regulation Commission

Dear Ms. Bamford:

I am writing to comment on the proposed changes to the current public access rule. While it is understandable that those states having statutory or regulatory direction to expose filings immediately upon receipt may take umbrage with the current IIPRC public access rule, the proposed change is counter intuitive to the viability of the IIPRC. The whole purpose of for-profit companies is to make a profit and freely giving innovative ideas to competitors, for whatever reason, goes against that purpose and the regulatory principle of maintaining insurer solvency. To pass a rule, as was so correctly pointed out in a recent conference call, that will cause companies to avoid using the Compact is just self destructive. The rule should be left "as is." If some item needs to be fixed, it should revert to the states having a feeling of unease for remedies in those states.

Let's face it, when filings are made on a state by state basis, it is much harder for competitors to appropriate new ideas for their own use. Putting new ideas on one universally accessible website before an innovator can profit from them serves no one except the plagiarists. At this stage of the Compact's development any course of action that threatens its existence should be considered very seriously.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Charles P. Breitstadt". The signature is fluid and cursive, with a long horizontal stroke at the end.