



December 2, 2013

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The Canadian Association of Direct Relationship Insurers (CADRI) is a trade association representing insurance companies who offer automobile, home and commercial insurance products to Canadians on a direct basis. Whether through the web, on the phone or face-to-face, CADRI members provide end-to-end service and are in direct relationships with their customers through all steps of the sales and service process.

CADRI monitors the insurance regulatory environment in all Provinces and Territories and supports regulation that encourages distribution accessibility and efficiency, technological innovation and other measures necessary for a healthy and competitive insurance market for the benefit of all Canadians.

Because of their involvement as both distributors and underwriters of insurance products, CADRI members have developed a comprehensive understanding of all facets of the insurance business and are in a unique position to offer valuable input in the development of a Canadian insurance market regulatory framework that is responsive to customers' needs.

The members of CADRI are:

- belairdirect
- CAA Insurance
- Canadian Direct Insurance
- Co-operators General Insurance
- Desjardins General Insurance Group
- RBC Insurance
- State Farm
- TD Insurance

CADRI is pleased to provide comments on the Ontario Automobile Dispute Resolution Review Interim Report.

CADRI would like to take this opportunity to congratulate Justice Cunningham on meeting very challenging timelines and presenting a thorough report. CADRI members support the approach taken to set out clear principles that would guide any new dispute resolution system. The principles that have been put forward are consistent with those highlighted by CADRI members in our submission.

Principles of timeliness, proportionality, accessibility, predictability, streamlining the system and cost effectiveness are all fully supported by CADRI members. In our submission of September 20 we highlighted concerns about timeliness that CADRI members believed were undermining the system. We fully support a system that sets clear timelines. We are supportive of streamlining the system and continuing to ensure that mediation should remain an important component of the new system.



CADRI members support the recommendation that the Government explore moving the dispute resolution system to an external provider. However, we also want to reiterate our view that any external provider ensure that mediators and arbitrators are well versed in the SABS and that appropriate oversight is conducted.

We would welcome the opportunity to meet with you to discuss the recommendations included in the report and to offer operational expertise with respect to the proposed framework.

Yours truly,

Alain Thibault
Chairman/President/CEO
CADRI