

# State Farm Insurance Companies®

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State Farm Mutual Automobile Insurance Company appreciates the opportunity to provide feedback with respect to the Interim Report on the Ontario Automobile Insurance Dispute Resolution System (DRS) prepared by the Honourable J. Douglas Cunningham. We also appreciate the work that Mr. Cunningham has done to date with respect to investigating and addressing this very important issue.

Mr. Cunningham's Interim Report succinctly captures the context in which we operate and accurately details past and present trends and challenges. The Interim Report has laid out a number of recommendations (including a framework for potential legislation) that State Farm in general supports. This includes in particular (1) streamlining the mediation and arbitration processes, (2) moving the DRS adjudicative functions outside of FSCO into an independent public sector tribunal or the private sector, and (3) eliminating appeals to the Director's delegate and having appeals handled by a single judge of the Superior Court.

We agree that there are systemic problems in the DRS that need to be addressed through extensive overhaul. While of course we work within the context of the current system, we have no affinity for it.

We note the announcement that stakeholder consultations on the Interim Report will be held in December of this year in preparation for the final report. We are interested in participating in those consultations, and we ask that you provide us with the details of how to participate at the earliest opportunity.

We look forward to ongoing and detailed discussions as the Ontario government hopefully gives thorough consideration to the final recommendations. As always, State Farm is available to assist by lending our experience and expertise as the process moves forward.

Sincerely,



Barbara Bellissimo  
Chief Agent and Senior Vice President