



Chad Wilson
Associate Vice President
Government Relations

June 12, 2019

The Honorable Rob McColley
Ohio Senate
77 S. High St., 13th Floor
Columbus, OH 43215
VIA ELECTRONIC SUBMISSION

Re: SB 161 (Hottinger, Dolan) To specify requirements related to peer-to-peer car sharing in Ohio

Dear Chairman McColley,

On behalf of Nationwide, please support passage of SB 161, a bill that fosters innovation in the rapidly growing car-sharing industry while providing important consumer protections. Nationwide, a Fortune 100 company based in Columbus, Ohio, is one of the largest and strongest diversified insurance and financial services organizations in the United States. Our company takes great pride in providing thousands of jobs in the state and 1.25 million policies to Ohio residents.

Nationwide believes SB 161 is appropriately tailored for the state of Ohio. It encourages innovation and growth in the peer-to-peer (P2P) car-sharing space while also protecting consumers from unexpected gaps in coverage and establishing safety requirements. This industry is growing across the nation by connecting individual vehicle owners to drivers who need a car. P2P companies are attractive to vehicle owners because they help defer the cost of ownership or serve as an extra source of income, and to vehicle drivers because they provide more options by solving specific transportation needs and providing access to cars without the full cost of ownership.

As a leading protection company, Nationwide supports the regulatory framework established by SB 161 for insurance and safety recall requirements. The legislation contains the following elements that are critical to preserving Ohio's competitive insurance market:

- Insurers may rate and/or underwrite policyholders based on car-sharing activities;
- Due to the commercial nature of this transaction and the risk associated with increased vehicle use, P2P companies must provide primary insurance coverage during the car-sharing period;
- To ensure that consumers are appropriately notified of their rights, P2P companies are required to provide a variety of insurance disclosures to shared vehicle owners and shared vehicle drivers;
- The requisite insurance coverage limits for shared vehicle owners and shared vehicle drivers mirror the mandatory minimum limits required by the state of Ohio to legally operate a motor vehicle, while providing P2P companies the opportunity to require increased limits; and
- P2P companies are required to protect consumers by maintaining at least one-million dollars in insurance coverage.

In addition to elements preserving Ohio's competitive insurance market, the legislation also contains the following provisions that protect both shared vehicle drivers and the public from vehicles that are subject to safety recalls:

- P2P companies must institute appropriate safety protocols while working with car sharing vehicle owners as a condition of vehicle eligibility for use in a P2P program;
- P2P companies are required to verify that the vehicles in the program do not have outstanding safety recalls before the shared vehicle owner makes the shared vehicle available; and
- P2P companies are required to establish commercially reasonable procedures to determine any safety recalls that apply after the initial registration of a shared vehicle with the program.

Finally, the legislation appropriately defines the requirements that the P2P companies are to maintain and make available records of rental transactions on the platform, including but not limited to the duration of the rental and any losses or complaints associated with those transactions, for three years, which is an appropriate length of time for the state of Ohio.



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Again, thank you for considering support of SB 161, a bill that fosters innovation in the rapidly growing car-sharing industry while providing important consumer protections. Nationwide commends the state of Ohio for encouraging innovation and growth with this emerging mobility option.

Sincerely,

Chad Wilson
Associate Vice President
Nationwide Government Relations

Cc: Senator Hottinger, Senator Dolan, Ohio Senate Transportation, Commerce, and Workforce Committee