

**1. Reduce the length and complexity of the guide**

- Instruct consumers to read the terms and conditions detailed in their policy / certificate carefully, and that in the event of a dispute, the policy is the legal document which takes precedence, and from which claims will be adjudicated.
- Present Distribution Guide too lengthy. A suggestion to make it more user friendly would be to focus on main products, such as hospital/medical and trip cancellation plans and to summarize optional benefits coverage in bullet form. Refer the consumer to policy for details.
- Is the definition section absolutely necessary? Definitions are explained in policy booklet or online. Refer the consumer to policy for details.

**2. Limit the number of insurance products that may be offered in the same guide**

- Reviewing multiple distribution guides when the product is offered in one policy, would not be user friendly.
- Offering separate distribution guides per product would be confusing for the consumer and not sustainable, especially when purchasing different products at the same time.
- The purpose of the guide is to simplify the coverage. A suggestion is to have a few pages summarizing the insurability, the coverage per person, medical questionnaire & u/w. It could also state to refer to the policy booklet for full details of coverage.

**3. Give greater prominence to the exclusion, restriction, limitation and pre-existing condition clauses**

- In bold, include a statement stating that consumers should read their policy / certificate carefully, and that this would take precedence when adjudicating claims.
- Presently there is repeated information for similar products (e.g. for TIC it would include hospital/medical, multi-trips, youth package) in regards to benefits and exclusions. Suggestion: group the similar products with similar benefits and have one section detailing exclusions.

**4. Require that confirmation of insurance be separate from the guide**

- No comments.

5. **Facilitate access to the guide**
  - No comments.
  
6. **Extend the insurance policy rescission period from 10 to 30 days**
  - TIC feels the 10 day rescission period up to the date of the trip is sufficient, and is consistent with other provincial requirements. If the AMF believes that the extension is required, we would request an exemption from this requirement for travel related insurance products.
  
7. **Hold the insurers accountable for their distributors' fulfillment of their obligations**
  - TIC's existing requirements are appropriate and sufficient.
  
8. **Inspect the distributors**
  - No comments.
  
9. **Create a distributor's registry**
  - No comments
  
10. **Require that insurers control the incidental nature of the sale of insurance**
  - Our understanding is that the AMF is requesting that insurers now have an obligation to confirm that the type of insurance being offered is not only incidental to their main business, but that it is consistent with their main product being offered. If this is an accurate interpretation, this would have a significant impact to many existing distributors.

**11. Disclose the distributor's remuneration, whether direct or indirect, in all cases and in writing**

- This requirement should be in place on the confirmation of coverage.

**12. State the cost of the single premium insurance product in the guide, as well as the terms of reimbursement in case of cancellation**

- No comments

**13. Prepare call scripts that meet DWR requirements**

- No comments