

Testimony of

American Property Casualty Insurance Association (APCIA)

Senate Judicial Proceedings Committee

SB0726 Vehicle Laws - Personal Delivery Devices - Standards and Requirements Automated
Device

March 4, 2021

Support with Amendments

The American Property Casualty Insurance Association (APCIA) is a national trade organization representing nearly 60 percent of the U.S. property casualty insurance market. APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers. APCIA represents the broadest cross-section of home, auto, and business insurers of any national trade association. APCIA members represent all sizes, structures, and regions, which protect families, communities, and businesses in the U.S. and across the globe. APCIA appreciates the opportunity to provide written comments about Senate Bill 726.

SB 726 establishes a regulatory scheme for “personal delivery devices” permitting them to operate without registration or any highway, sidewalk or crosswalk in the State. It also excludes such devices from the definition of “motor vehicle”.. It is not clear who would be employing these devices as there is no limitation in the bill regarding ownership, and whose obligation it is to provide the required liability insurance. We suggest that it be made clear that the obligation to obtain liability insurance rests with the entity deploying and operating these devices. Insurance companies have worked with the General Assembly in the past regarding regulating other exposures such peer-to-peer car-sharing and transportation network companies such as UBER and look forward to working with the General Assembly again to ensure that we are not unintentionally covering a new exposure under auto policies. f

APCIA shares the concern that referring to these devices as “personal”, is inaccurate, and that changing the term to “automated delivery device” is a more appropriate description of these devices. Revising the term would also ensure that there was not unintended exposure created under personal lines insurance policies that could increase loss costs for consumers as these claims arise Therefore, APCIA requests that the term “personal” delivery device be change to AUTOMATED throughout the bill.

For these reasons, APCIA urges the Committee to adopt the proposed amendment to Senate Bill 726.

Respectfully submitted,

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