

## [Comments on Sharing Economy Whitepaper](#)

UP submitted comments to the National Association of Insurance Commissioners regarding the [Sharing Economy Working Group draft whitepaper](#) addressing the insurance implications of Transportation Network Carriers (e.g., Uber/Lyft) and principles for regulators. UP Executive Director Amy Bach, in her capacity as an official consumer representative to the NAIC, is a member of the Working Group and the Property/Casualty Subcommittee. The focus of UP's comments related to potential gaps in coverage when drivers have the application open but do not have a passenger, consumer expectations, and issues associated with complex surplus lines insurance policies.

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