

**Carrie Negrette**  
Executive Director  
carrie@idahosurplusline.org

**OFFICERS**

**GREG SWENSON**  
President  
P.O. Box 8567  
Boise, ID 83707  
208-343-7741

**JACOB FLORENCE**  
VP & President-elect  
157 River Vista Place  
Twin Falls, ID 83301  
208-734-1711

**TOM L. WEBSTER, AU**  
Secretary-Treasurer  
485 E. Riverside Drive  
STE 300  
Eagle, ID 83616  
208-246-8813

**Immediate Past President**  
**JAN CHRISTENSEN**  
P.O. Box 5538  
Boise, ID 83705  
208-345-6852

**DIRECTORS**

**Jordan Redman**  
Region I  
1410 S. Lincoln Way  
STE 100  
Coeur D'Alene, ID 83814  
208-664-5263

**MIKE MARTIN**  
Region II  
P.O. Box 699  
Lewiston, ID 83501  
208-743-6543

**JASON SWAN**  
Region III  
13177 W. Persimmon Lane  
Boise, ID 83713  
208-322-5525

**MIKE HENDERSON**  
Region IV  
3597 E. Monarch Sky Lane  
STE 240  
Meridian, ID 83646  
208-350-7008

**Staci Matheson**  
Region V  
P.O. Box 51019  
Idaho Falls, ID 83405  
208-522-5656

May 30, 2025  
Attn: Director Dean Cameron  
Department of Insurance  
State of Idaho

Dear Director Cameron,

On behalf of the Surplus Line Association of Idaho's Board of Directors, I am writing to submit our recommendations following a recent and thorough review of the Idaho Export List.

After careful consideration and discussion among our Board and members, we respectfully request the following additions to the Idaho Export List. Supporting rationale for each proposed addition is provided on the attached pages.

**Proposed Additions:**

**Miscellaneous Specialty Lines**

- Cyber Liability

**Fire and Allied Lines**

- Habitational (Apartments/Condo Associations) – Over 30 Years Old
- Hotel/Motel – Over 30 Years Old

**General Liability**

- Hotel/Motel – Over 30 Years Old

We appreciate the opportunity to participate in this important review and remain committed to supporting the Idaho Department of Insurance in its mission to foster a responsive and resilient insurance marketplace. Should you have any questions or need further information, please feel free to reach out to me or to our Executive Director, Carrie Negrette.

Thank you for your continued leadership and support.

Sincerely,



[Tom Webster \(May 30, 2025 10:47 MDT\)](#)

Tom Webster  
Secretary Treasurer  
Surplus Line Association of Idaho

## **Attachment: Supporting Rationale for Proposed Export List Additions**

### **Miscellaneous Specialty Lines**

#### **Cyber Liability**

*Recommended by Clint Paskewitz, Associated Insurance Services*

#### **Rationale:**

- Rapidly Evolving Risk Landscape: Cyber threats such as ransomware and phishing are constantly emerging and evolving. Regulatory constraints can delay the ability of insurers to respond with innovative coverage solutions.
- Lack of Standardization: Unlike traditional lines (e.g., auto, property), cyber liability coverage does not conform to standardized policy forms. Coverage must be tailored to address the unique digital exposures of businesses of all sizes.
- Increased Access and Affordability: Exempting cyber from the filing requirement would allow insurers greater flexibility to adapt coverage and pricing, encouraging market competition and helping small businesses afford critical protection.
- Consistency with Other Exemptions: Other complex and evolving lines, such as certain professional liability coverages, have been granted exemptions for similar reasons. Cyber insurance, with its dynamic and specialized nature, merits the same consideration.
- Continued Consumer Protections: Even with exemption status, insurers would remain subject to solvency oversight and regulatory safeguards to ensure consumer protection remains intact.

#### **Summary:**

Adding Cyber Liability to the Export List would empower insurers to respond more efficiently to emerging risks, increase availability of affordable coverage, and support Idaho's businesses in mitigating cyber incidents—ultimately fostering innovation and economic resilience.

### **Fire and Allied Lines**

#### **Habitational (Apartments/Condo Associations) – Over 30 Years Old**

#### **Hotel/Motel – Over 30 Years Old**

*Recommended by Ann Watkins, Martin Insurance*

#### **General Liability**

#### **Hotel/Motel – Over 30 Years Old**

*Also Recommended by Ann Watkins, Martin Insurance*

---

**Rationale:**

- Outdated Benchmarking: The current export eligibility date (pre-1975) may have originally been based on the discontinuation of aluminum wiring due to its fire hazard. However, market conditions have shifted significantly since then.
- Limited Admitted Market Appetite: Properties with any habitational component over 30 years old—including apartments, condos, hotels, and motels—are increasingly declined by admitted carriers, regardless of condition, unless they have undergone complete gutting and renovation of electrical, plumbing, HVAC, and roofing systems.
- Recent Market Contraction: Historically, some admitted carriers (e.g., Red Shield) were willing to underwrite these risks. However, many have recently withdrawn from these segments, leaving brokers with few viable admitted options.
- Burden of Diligent Search: While a diligent search may still be performed, producers consistently find a universal lack of admitted market availability for these risks, making the current process unnecessarily burdensome and inefficient.

**Summary:**

Due to the widespread reluctance of admitted carriers to write properties with residential components over 30 years old, regardless of updates, these risks are regularly forced into the non-admitted market. Designating them as exportable would reduce administrative burdens and better align with current underwriting realities, ensuring timely and appropriate coverage placement for Idaho property owners and businesses.







# 2025 Idaho Export List Reccomendations

Final Audit Report

2025-05-30

Created:	2025-05-30
By:	Carrie Negrette (carrie@summitmg.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAbcXY3FgPib0hGcqmj5-rj0eO5EuJrJ3u

## "2025 Idaho Export List Reccomendations" History

-  Document created by Carrie Negrette (carrie@summitmg.org)  
2025-05-30 - 4:44:13 PM GMT
-  Document emailed to tom\_webster@rpsins.com for signature  
2025-05-30 - 4:45:05 PM GMT
-  Email viewed by tom\_webster@rpsins.com  
2025-05-30 - 4:45:36 PM GMT
-  Signer tom\_webster@rpsins.com entered name at signing as Tom Webster  
2025-05-30 - 4:47:26 PM GMT
-  Document e-signed by Tom Webster (tom\_webster@rpsins.com)  
Signature Date: 2025-05-30 - 4:47:28 PM GMT - Time Source: server
-  Agreement completed.  
2025-05-30 - 4:47:28 PM GMT