



Janet T. Mills  
Governor

STATE OF MAINE  
DEPARTMENT OF PROFESSIONAL & FINANCIAL REGULATION  
BUREAU OF INSURANCE



Joan F. Cohen  
Commissioner

April 1, 2025

Senator Donna Bailey, Senate Chair  
Representative Lori Gramlich, House Chair  
Joint Standing Committee on Health Coverage, Insurance and Financial Services  
100 State House Station  
Augusta, Maine 04333

Re: L.D. 1180, "An Act to Prohibit Persons from Providing Incentives to Customers for Opting Out of Paper Billing"

Dear Senator Bailey, Representative Gramlich and Members of the Committee:

The Bureau of Insurance provides the following comments regarding proposed amendments to LD 1180, "An Act to Prohibit Persons from Providing Incentives to Customers for Opting Out of Paper Billing."

Many insurers offer incentives to their customers to receive electronic billing. Insurers are able to justify these incentives because it costs the insurers less to provide bills electronically than to print and mail invoices. This is a financial benefit to those insureds who choose to receive their billing electronically without penalizing those who wish to receive paper bills.

Section 3 of the amended bill provides that agencies within PFR are responsible for taking enforcement action against their licensees for violations, and Section 4 specifies penalties for violations. If the Bureau of Insurance is to be responsible for enforcing violations against insurance licensees, we suggest that the penalties be those already available to the Bureau under 24-A M.R.S. § 12-A.

I hope this information is helpful.

Sincerely,

Robert L. Carey  
Superintendent

Office Location: 76 Northern Avenue, Gardiner, Maine 04345  
Mailing Address: 34 State House Station, Augusta, Maine 04333  
[www.maine.gov/pfr/insurance](http://www.maine.gov/pfr/insurance)

Phone: (207) 624-8475

TTY: Please Call Maine Relay 711

Consumer Assistance: 1-800-300-5000

Fax: (207) 624-8599