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Mr Bob Gibbons  
Inquiry Manager  
Private Motor Insurance Market Investigation  
Competition Commission  
Victoria House  
Southampton Row  
London  
WC1B 4AD

Dear Mr Gibbons

The Consumer Council has been working with stakeholders in NI to reduce the high cost of car insurance in Northern Ireland for a number of years. As such we support the Competition Commission's (CC) statement of issues and the scope of the investigation for the next two years.

Under the terms of the investigation under the heading; "harm arising from the separation of cost liability and cost control" we note that the Competition Commission has stated that it will largely exclude issues around the Cost of Personal Injury(PI) Claims. The reason for this is that the Ministry of Justice (MoJ) is considering reforms to reduce the cost of PI claims.

The Consumer Council believe that NI consumers still suffer detriment as a consequence of the administration of PI claims and compensation levels and would like to see consideration given to PI's in NI by the CC investigation since they are outside the scope of MoJ given the devolution of Justice to the NI Assembly. To support this point we enclose the relevant sections of "Quote...Unquote", our briefing to the NI Justice Committee and the relevant section of the OFT's report in December 2011.

With the exception the issue above, we are content the range and the breadth of the CC's statement of issues will result in a thorough investigation of the market. The Consumer Council intend to work closely with the Competition Commission to ensure the particular

aspects of the NI market are reflected and that the consumer voice is heard and detriment suffered by NI Consumers is tackled.

We look forward to continuing to develop a close working relationship with you over the period of the investigation.

Yours sincerely

**JOLEEN CUNNINGHAM**  
Head of Money Affairs