

Inquiry Manager  
Private Motor Insurance Market Investigation  
The Competition Commission  
Victoria House  
Southampton Row  
London  
WC1B 4AD  
pmi@cc.gsi.gov.uk



6 September 2013

Dear Sir

**The Supply or Acquisition of Private Motor Insurance and Related Goods and Services (the "Market")**

The MSL group of companies have been established for over 25 years. We offer a range of legal expenses insurance products and post accident services through the insurance broker market.

MSL has previously written to yourselves welcoming the Competition Commission investigation into the private motor market but at the same time pointing out that your investigation needs to focus primarily on the customer by ensuring that at all times the customer is treated fairly and is not prejudiced, in any way, by the actions of a third party insurer when a non fault accident occurs.

MSL have been a member of the CHO for a number of years and have had sight of the final document which they have submitted to you. MSL fully endorse the submission which has been made by the CHO and in the interests of brevity do not propose to repeat the numerous valid arguments which have been advanced on behalf of the industry collectively.

We do however wish to emphasise our concerns that in the rush to consider the economic arguments there has been a failure to take into account the interests of non fault Claimant (with an entirely valid claim for compensation). It remains a fundamental right of a party that has been wronged to be put back in the position they were in beforehand, with no detriment to the harmed party. Your papers do not seem to have focussed on this aspect which in our view is the breach of a basic human right which is part of the UK law and has been for many years.

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You do not appear to have taken into account a reasonable balance of assessment of costs nor commented on the importance and value of consumers' basic legal rights. These legal rights are continually referred to by courts and we believe that the Commission needs to reflect more closely on this basic principle.

The Commission need to place paramount importance on the law and consumer protection. References to 'overcosted' in our view is wholly inappropriate because without credit hire motor insurers would simply ride roughshod on consumers who do not have the means to battle the plethora of lawyers that motor insurers have at their disposal.

Yours Faithfully,

Grahame Davies  
Legal Services Manager