

## **Transactor Global Solutions Limited response to PMI formal consultation on draft order**

Dear Sir/Madam,

We are responding to the Draft Order consultation “The Private Motor Insurance Market Investigation Order 2015” and the offer of NCB/NCD protection to consumers of private motor insurance.

Transactor Global Solutions Limited (TGSL) are one of the Top 5 software houses within the UK insurance industry with a diverse user base including a number of clients specialising in the PMI space. The Transactor product has been developed to produce a complete range of insurance processes running under the latest versions of the Microsoft .Net Framework, supporting multi-role deployment differentiation through the use of ‘user operable’ toolsets.

TGSL are members of the Electronic Trading Platform Group (ETPG), which as we are sure you are aware, is a key group representing some of the key software houses, intermediaries, insurers and third party businesses within the general insurance market. Polaris, the body owned and run by the insurance industry, facilitates the ETPG. TGSL work with in excess of 50 insurers, MGA's and underwriting agencies and have over 120 clients.

TGSL are aware that the CMA has published for consultation a Draft Order and Draft Explanatory Note to implement the package of remedies included in the CMA's Private motor insurance market investigation: Final report, published on 24 September 2014. TGSL are awaiting further clarity, like many other businesses, on the exact requirements of this Draft Order but have been considering this and the impact of such order on the Transactor application, its client base and insurer partners. The key consideration being given is around the following areas:

- Impact on Technical development and configuration of the application
- Timescale to implement
- Disruption to business (inc TGSL, our client base and insurer partners)

From the information received to date, whilst TGSL do not believe there are technical challenges to implement the Draft Order, we believe there would be significant logistical challenges both administration and commercial that would impact delivering a solution in the timescales required. These logistical challenges are summarised as follows:-

- Questions and Comments Document raised by the ETPG Advisory Group in December 2014 still requires clarification from CMA for Insurers to know how best to deal, and therefore will potentially impact the following:-
  - Scheme – Rates and Underwriting changes;
  - Documentation changes and distribution to market;
  - New Product Writer properties to be considered;
  - Changes to EDI Message;
  - Lead in time required for all Insurers and the number of schemes ;
  - Impact on the lifecycle of current policies with Renewals being a major concern as the lead in time would need to be sooner.
- Website disclaimers (pop up screens);
- Any changes to scripting to accommodate NCD Protection Statements.

Polaris, in conjunction with the ETPG, has created a high-level plan estimating a realistic implementation date between quarter 2 and quarter 3 2016. We consider this to be a more realistic timescale for delivery.

We appreciate the reasons for the order and will provide our full commitment to complying with it, however, we can only progress as quickly as all other stakeholders i.e. Insurers, MGA's and Customers.