

WESTERN NEW YORK LAW CENTER

Discriminatory Auto Insurance Practices in Western New York

An examination of the impact non-driving and
socioeconomic factors have on Western New York
Drivers Auto Insurance Premiums

December 17th, 2015

Introduction

In the United States, particularly in Western New York, automobile ownership is a key factor in accessing economic opportunities in urban, suburban, and rural labor markets. Without reliable transportation, many workers have limited access to high-paying employment opportunities. New Yorkers' relationship to motor vehicles means that over half of a million workers in Western New York are required to carry limited liability auto insurance. Due to current New York State law, auto insurers have free rein to use a host of socioeconomic and other non-driving factors to calculate driver premiums, ultimately charging low- to moderate-income Western New York drivers higher premiums for limited liability insurance than their high-income peers.

Drivers in New York and forty-eight other states are required by law to carry limited liability insurance. However, not all good drivers are treated equally by auto insurers. In the New York auto insurance marketplace, insurers are allowed to use a host of non-driving factors to calculate a driver's auto insurance premium. New York insurers, specifically Progressive Insurance Company and Liberty Mutual Insurance Company, place significant weight on socioeconomic and non-driving factors, which results in groups of drivers paying disproportionately more for limited liability auto insurance than peers. These targeted groups include low-income drivers, drivers of low socioeconomic status, racial minorities, and female drivers.

The Western New York Law Center (Law Center) conducted an in-depth examination of auto insurance premiums across eight counties in Western New York. The study examined the impact of socioeconomic factors on the premiums a good driver pays for limited liability auto insurance. This study is an extension of a study by the Law Center in July 2015 that looked at the impact of gender, education, and occupation on auto insurance premiums. The findings of the Law Center's examination of auto insurance premiums in Western New York follow the same trends found in July 2015; good drivers with low socioeconomic status pay substantially more for limited liability auto insurance when compared to higher-status peers.

New York State allows auto insurers who conduct business in the state to collect and use non-driving factors to determine a driver's premium for services. This report clearly demonstrates that by allowing insurers to use non-driving variables, women, single female drivers, renters, those with lower levels of education, lower-status employment, and those with lower credit scores will pay more for limited liability auto insurance.

All auto insurance premiums in the New York State have risen significantly since 1989. According to the Consumer Federation of America, auto insurance premiums for limited liability coverage have increased by 62.2% from 1989 to 2010. The increase New York is roughly 20% greater than that of the national average. The Federal Reserve and Department of Treasury have suggested that a reasonable annual expenditure for auto insurance premiums for all drivers is 2% of their annual gross income. The Law Center found that few premiums for low- to moderate-income Western New York Drivers fell below 2% of the region's median income. The price of automobile insurance has risen drastically in New York, and rests well above the recommended reasonable expenditure for the service.

The states of Massachusetts and California have implemented insurance laws and regulations that have addressed many issues currently facing New York drivers. The laws in these states prohibit the use of

socioeconomic factors in determining a driver's premiums. Furthermore, both states have rules put in place to ensure that all good drivers can purchase auto insurance at a reasonable market price, regardless of their income or relative socioeconomic class. New York State prides itself on being a leader in the nation with regard to ensuring consumer protections, yet the State allows an unfair auto insurance marketplace for drivers who are legally required to purchase limited liability automobile insurance. It is imperative that New York drivers have an opportunity to participate in a fair and equitable insurance marketplace. In order to achieve this goal, it is necessary for state lawmakers to reform the current insurance laws to prohibit the use of socioeconomic indicators and establish a system that ensures automobile insurance premiums are set within a reasonable standard of affordability.

Study Motivation

The Law Center works extensively with community members who face home foreclosure and consumer-related legal matters. Through the process of representation and guidance, the Law Center observes many financial hardships are associated with such legal matters and systemic problems connected to these legal issues. The majority of people served by the Law Center at its consumer debt clinics have incomes that fall below 150% of the Federal Poverty Level. Through serving low- to moderate-income community members, the Law Center found that low-to moderate- income individuals are paying significantly more for financial products compared to high-income and higher-wealth clients. The high cost of necessary products places a significant strain on Western New Yorkers' ability to meet basic financial needs, such as mortgage, rent, or electricity.

Through providing assistance to community members obtaining a mortgage loan modification, or aiding in reestablishing a community member's finances after facing consumer debt issues, the Law Center has identified expenses that place a significant strain on household budgets. Law Center attorneys examining foreclosure clients' budgets frequently note that clients are paying excessive auto insurance premiums. Further, when Law Center staff speak with visitors at weekly legal services clinics, clients express that they believed their insurance premiums high, and auto insurers would not respond to client questions about why their rates were increasing in spite of safe driving habits. In a brief survey of fifty visitors to the Law Center clinics, over 60% of visitors stated that they felt their premiums were out of their control and that they did not know why they were being charged high premiums for auto insurance. Through follow-up questioning, it became clear that there are significant disparities in premiums paid by drivers who possess similar driving records and habits.

Due to the frequency of these instances, and conversations with New York and national consumer advocates, the Law Center began to examine the question of why auto insurance premiums were drastically different for people who had similar driving habits and were comparable drivers. The Law Center began by discussing the issue with other New York organizations who previously had looked at issues surrounding insurance premiums. Fellow members of New Yorkers for Responsible Lending expressed similar concerns about high auto insurance premiums, especially for low- to moderate-income drivers. Through isolated experiments, the Law Center identified an array of factors that impact a driver's premium outside of their driving record and driving habits. The results of the experiments indicated that factors being used by insurers were indicative of one's socioeconomic status rather than the ability to responsibly operate a motor vehicle. Based on these experiments, the Law Center

developed an in-depth study to examine the extent to which socioeconomic factors impact auto insurance premiums across eight counties in Western New York.

Study Design and Assumptions

In order to properly examine the impact of specific factors on a given driver's premium, the study isolated specific rate factors while holding all other variables constant. For the purpose of this study, the driver being examined was 30 years old with a clean driving record, driving 10,000 miles per year, who owns a 2005 Honda Civic DX sedan outright. The specific zip codes used were in Niagara, Erie, Chautauqua, Cattaraugus, Allegany, Wyoming, Genesee, and Orleans counties. These areas have a median income below \$47,000 per year, as indicated in the U.S. Census Bureau's 2010-2014 American Community Survey 5-Year Estimates.

The premiums presented in this study were generated by using Progressive Insurance Company and Liberty Mutual's online quote tools. Driver profile information was submitted to the online quote tool on each provider's webpage to generate a quote.¹ The quotes are presented in the form of annual premiums through monthly payments for state-required minimum limited liability coverage. No additional coverage was added beyond the \$25,000/50,000 state-required minimum liability coverage.

The independent variables are considered to be indicators of a person's socioeconomic status and relative wealth. These were manipulated to gauge their impact on premiums provided by the online quote tools. The experiment looks specifically at the impact of a person's level of education, occupation, marital status, gender, homeownership status, and level of prior insurance coverage.² It is assumed that a single female driver holding a high school diploma, working an hourly position, renting a home, with no prior coverage holds the lowest socioeconomic status among the drivers examined.

Summary of Findings

Progressive Insurance Company³:

- Progressive charges a female driver with a clean driving record as much as 21% (\$1,587 vs. \$1,262) more than a male driver with a clean driving record.
- Progressive charges a single, divorced, or widowed female driver 17% (\$1,401 vs. \$1,135) more than a married female with two drivers on the policy, with the same clean driving record.

¹ See Appendix A for detailed information on the profiles examined.

² See Appendix B for details on how the numerated factors were manipulated.

³ For the purpose of this study Zip Codes in Niagara, Erie, Chautauqua, Cattaraugus, Allegany, Wyoming, Genesee, and Orleans counties where the median income was at or below \$47,000 were examined. The car being used was a 2005 Honda Civic DX Sedan. In all instances the driver had a clean driving record with no violation or accidents. The following factors were manipulated independently and in isolation; education, occupation, gender, marital status, homeownership, and prior coverage.

- Progressive charges a female driver with a clean driving record, a high school diploma, working as a bank teller 13% (\$1,404 vs. \$1,221) more than a female driver with the same driving record, with a Master's Degree, working as a vice president.
- Progressive charges a male driver with a clean driving record, a high school diploma, working as a bank teller 11% (\$1,262 vs. \$1,114) more than a male driver with the same driving record, with a Master's Degree, working as a vice president.
- Progressive charges both female and male drivers who have a lapse of less than 6 months as much as 35.85% (\$1,244 vs. \$798) more than drivers with continuous coverage.
- Progressive charges a female driver with the lowest socioeconomic status 143% (\$1,587 vs. \$1,105) more than a married male of high socioeconomic status.⁴
- Across all profiles, Progressive's average premiums account for 3.56% of the gross income of a family of 4 living at 150% of the Federal Poverty Line.⁵
- In the City of Buffalo, Progressive's average premiums account for 5% – 8.44% of the gross income of a family of 4 living at 150% of the Federal Poverty Line.⁶
- Progressive charges the average good driver in Buffalo 186% more than the average driver from surrounding suburban and rural areas.

Liberty Mutual Insurance Company⁷:

- Liberty Mutual charges a female driver with a clean driving record, a high school diploma, working as a bank teller 8% (\$1,302 vs. \$1,198) more than a female driver with the same driving record, with a Master's Degree, working as a vice president.
- Liberty Mutual charges a male driver with a clean driving record, a high school diploma, working as a bank teller 9% (\$1,345 vs. \$1,223) more than a male driver with the same driving record, with a Master's Degree, working as a vice president.
- Liberty Mutual charges a single, divorced, or widowed female driver 16% (\$1,321 vs. \$1,101) more than a married female with two drivers on the policy, with the same clean driving record.
- Liberty Mutual charges both female and male drivers who have a lapse of less than 6 months as much as 24% (\$1,044 vs. \$792) more than drivers with continuous coverage.
- Liberty Mutual charges a female driver with the lowest socioeconomic status 136% (\$1,476 vs. \$1,083) more than a married male of high socioeconomic status.
- Across all profiles, Liberty Mutual's premiums account for 3.64% of the gross income of a family of 4 living at 150% of the Federal Poverty Line.⁸

⁴ High socioeconomic status is noted as drivers who have a Master's Degree, work as a vice president, owns their home, and have previous insurance

⁵ The percentage of income is based on 150% of the Federal Poverty Level for a family of 4, which is an annual income of \$36,375

⁶ The percentage of income is based on 150% of the Federal Poverty Level for a family of 4, which is an annual income of \$36,375

⁷ For the purpose of this study Zip Codes in Niagara, Erie, Chautauqua, Cattaraugus, Allegany, Wyoming, Genesee, and Orleans counties where the median income was at or below \$47,500 were examined. The car being used was a 2005 Honda Civic DX Sedan. In all instances the driver had a clean driving record with no violation or accidents. The following factors were manipulated independently and in isolation; education, occupation, gender, marital status, homeownership, and prior coverage.

⁸ The percentage of income is based on 150% of the Federal Poverty Level for a family of 4, which is an annual income of \$36,375

The State of the Low-to Moderate-Income Drivers in Western New York

As previously stated, New York State requires that all drivers operating a car on state roads carry limited liability auto insurance. Despite the fact that all drivers are required to carry this insurance, they are not all treated equally in the marketplace. Under current New York statutory and regulatory conditions, auto insurers are allowed to use any non-driving factor except race, religion, or national origin to determine a driver's premium. Though race cannot be an independent variable in setting insurance premiums in New York, there is a correlation between minority populations and low-wage jobs, low socioeconomic status, high-density urban populations. Using these factors to categorize populations therefore identifies minority populations without insurance companies explicitly targeting race. As a result of these conditions, low-income and minority drivers with clean driving records are paying substantially more for limited liability auto insurance.⁹

In New York, hardworking residents rely on a car to conduct their daily affairs. Automobile ownership is not a luxury in Western New York, but a necessity, especially in low-income communities. Due to the cost of living in the region, many workers live a considerable distance from their workplace and need a car to commute to and from work. With poor public transportation options, many commuters have no practical choice but to own a car. Public transportation is a non-option for many suburban and urban workers, who have to combat limited service areas and unfriendly timetables. The underwhelming public transit systems make the option unrealistic for most Western New York commuters. Across the eight counties examined in this study, roughly 88.5% of workers rely on a car to commute to and from work.¹⁰ The problem is compounded in rural areas, where a car is a necessity in face of fewer public transportation options and greater distances to basic goods and services.

The Role of Socioeconomic Indicators in Auto Insurance Premiums

The car insurance industry has long claimed that the use of personal information, regardless of its relevance to one's ability to use a car properly, allows insurers to better determine the driver's risk potential for claims. New York State legislature and regulatory agencies have afforded auto insurers carte blanche to use any information they chose to evaluate a driver's risk under a loose standard of proving discrimination. Auto insurers are able to gauge one's wealth and value as a customer through the use of socioeconomic indicators such as education, occupation, marital status, homeownership, credit score, and prior insurance coverage, as well as other non-driving factors including gender.

Despite this long-standing practice, the reality is that the use of socioeconomic indicators leads to good drivers with less wealth paying higher premiums than bad drivers with a good deal of wealth. Drivers who possess higher incomes are considered more attractive customers, regardless of their driving

⁹ Lower-income Households and the Auto Insurance Marketplace: Challenges and Opportunities, Consumer Federation of America, January 2012

¹⁰ U.S. Census Bureau's 2010-2014 American Community Survey 5-Year Estimates

records. Such drivers are able to purchase more insurance products and higher coverages, which leads to significant financial gains for insurance companies. The higher premiums paid by low-wealth drivers are subsidizing premium discounts for higher socioeconomic status drivers with tarnished driving records.

A driver living in Western New York who has the lowest socioeconomic status identified in the study will pay nearly twice the rate of a higher socioeconomic status driver with the same driving record. In order to evaluate one's risk as a driver in an equitable manner, the focus needs to be placed on driving-related factors rather than on a driver's potential ability to purchase additional products. All Western New Yorkers deserve the opportunity to be treated fairly within the car insurance marketplace regardless of their relative socioeconomic status. Good drivers should pay the lowest premiums regardless of their socioeconomic status.

Educational Attainment and Occupation's Impact on Low Socioeconomic Status Drivers

The Law Center's analysis revealed that both carriers, Progressive and Liberty Mutual, charge good drivers with low education and low-status jobs more for limited liability auto insurance than peers in a different socioeconomic class. Progressive charges a male driver with a clean driving record and high school diploma, working as a bank teller 11% more than a male driver with the same driving record, who holds a Master's Degree and works as a vice president. Liberty Mutual would charge the high school-educated male bank teller 9% more than his Master's-holding vice president counterpart. Progressive charges female drivers with a clean driving record and high school diploma working as a bank teller 13% more than a female driver with the same driving record, a Master's Degree, and a position as a vice president. For the same pair, Liberty Mutual will charge the female working as a bank teller 8% more than the female working as a vice president. Good drivers with less education and lower-status jobs pay substantially more for limited liability auto insurance.

The impact of a person's level of education on their income potential, professional attainment, and relative financial mobility in society are well documented. Frequently, the conversation about education, occupation, and mobility focuses on one's income potential and the disparities that are created within our society as a result. It is well established that the income potential of a worker with a lower level of education will be significantly less than that of a worker with a higher level of education. Regardless of income, there are financial obligations and necessities that exist in an individual's life, meeting these necessary expenditures is challenging for most people but it is substantially harder for those who possess less education working in low-status jobs.

Not only does education affect the overall income and possible professional opportunities afforded to a person, it has a significant impact on the price people pay for financial services, specifically automobile insurance. Drivers in Western New York who have lower levels of education pay significantly more for limited liability auto insurance compared to their higher-educated peers. The higher price of basic financial services leads to further financial hardships for New York drivers.

Progressive's Disparate Treatment of Female Drivers

The Law Center previously discovered (July 2015) that Progressive charged female drivers in Buffalo significantly more for limited liability auto insurance compared to their male peers. While analyzing premiums across Western New York, the established trend persisted throughout the region. Progressive charges female drivers with a clean driving record as much as 21% more than a male driver with a clean driving record. Liberty Mutual charges male drivers on average 3% more compared to similar female drivers. Independent of all other factors, female drivers with Progressive pay premiums that are significantly higher than their male counterparts.

There is evidence for a gender-based wage disparity in the United States. Female drivers on average have less wealth than male drivers, yet Progressive quotes women a higher premium than men. In Buffalo, home to the largest female workforce in the region, the median income for a female worker is \$5,642 less than the median income for a male worker.¹¹ Income inequality is further amplified by higher costs of basic necessities, including limited liability auto insurance. The difference in income and Progressive's discriminatory use of gender in determining premiums places a significant burden on women, most undiplomatically on low-income female and single mothers.

Widowed, Single, and Divorced Drivers Pay More than Married Couples

Despite married couples in this study having two drivers on their policy, widowed, single, and divorced female drivers pay higher premiums than the couples. The findings in this study echo the findings of the Consumer Federation of American (CFA) in their examination of marital status on female drivers' insurance premiums.¹² As CFA asserts in their examination, it defies logic that people with a single driver on their policy pay significantly more than two drivers pay. Married couples have greater income potential and are paying less for necessary auto insurance.

In Western New York Progressive charges single, divorced, or widowed female drivers 17% more than a married female with two drivers on the policy, with the same clean driving record. Liberty Mutual charges single, divorced, or widowed female drivers 16% more than a married female with two drivers on the policy, with the same clean driving record. The higher socioeconomic status is associated with being married is here correlated with lower auto insurance premiums. Further, females who have lost income due to the loss of a spouse or a divorce are faced with additional financial hardships when their auto insurance increases as the result of a non-driving event in their life.

¹¹ U.S. Census Bureau's 2010-2014 American Community Survey 5-Year Estimates

¹² New Research Shows Major Auto Insurers Vary Pricing Considerably Depending on Marital Status, Consumer Federation of America, July 2015

The Reality of Short-Term Lapses in Coverage

As low- to moderate-income Western New Yorkers' income fluctuates, it is not always possible to meet the expense of owning a car and high insurance premiums. Consequently, many low- to moderate-income drivers have short-term lapses in coverage. The Law Center has worked with numerous individuals at consumer clinics who are forced to sell their car or have their car repossessed. With no car, there is no need to maintain car insurance, so a reasonable lapse in coverage is undertaken. When another vehicle is purchased, the lapse in coverage works against the driver.

During an outreach event, Law Center staff met a US Veteran, Mr. G, who shared that he had been home from serving in Iraq for two years and had struggled to find steady work since returning. He had been working on and off at various construction jobs and living with his family in rural Erie County, New York. Mr. G shared that it is expected for people in the construction and contracting profession to have a car. His truck was his lifeline that allowed him to get short-term work in the region when he did not have a consistent job. However, he shared that his mounting debt was causing a problem and he had to sell his car to pay down his debt. As a result, he struggled to find any work. When we spoke, he had just been lent money to buy a truck so he could take a construction job in Buffalo. He was grateful to the person who had lent him the money but he said he was once again facing financial difficulties. When asked why he was struggling he mentioned his auto insurance had doubled from when he had sold his truck five months prior.

The example of Mr. G is not an isolated incident, but rather a prime example of how people faced with difficult circumstances must make financial choices that often result in the sale of their car. Frequently, New York drivers in such situations fall into low- to moderate-income brackets and already pay overly high rates for auto insurance. Auto insurers further marginalize low- to moderate-income drivers by punishing them for short lapses in coverage, often due to the driver not owning a car for a period of time.

The Use of Credit Score in Calculating Auto Insurance Premiums

The Law Center's study did not explicitly examine credit score, but other national organizations have released research findings indicating that credit score plays a significant role in calculating auto insurance premiums in New York State. In their September 2015 issue, Consumer Reports examined credit score among other socioeconomic factors as factors in insurance pricing in New York State and across the nation. Their findings revealed that drivers with good credit and a clean driving record pay as much as \$1,759 less than good drivers with poor credit.¹³ The study also found that a driver with excellent credit and a DWI (Driving While Impaired) conviction pays \$589 less than a driver with a clean driving record and poor credit.¹⁴

¹³ The Truth About Car Insurance, Consumer Reports, September 2015

¹⁴ The Truth About Car Insurance, Consumer Reports, September 2015

Communities with high minority and low- to moderate-income populations tend to also have many residents who have low credit. The low credit may be a result of having no credit history rather than having negative credit history. Because of the way credit scores are calculated, a person who has no credit history is evaluated the same as an individual with negative information in their credit history. As a result, drivers with low credit scores pay significantly more for auto insurance regardless of their driving record.

The Compounding Impact of Socioeconomic Factors and their disparate impact on Auto Insurance Premiums

Auto insurer use of a range of socioeconomic factors and non-driving variables has compounding impact on low- to moderate-income drivers. Frequently, drivers are who have low status in one of the socioeconomic categories do not have a high status in all of the other categories. Consequently, the use of socioeconomic factors in generating auto insurance premiums has a compounding effect.

A driver who is of the lowest status, in terms of car insurance classifications, pays considerably higher premiums compared to a high-status driver with the same clean driving record. Across the eight counties examined in this study, a female driver who is of the lowest socioeconomic status and has the lowest marks in non-driving categories will pay as much as 163% more than a married female with the highest socioeconomic status and the highest marks in non-driving categories. It is clear that drivers are not being evaluated for their driving. Further, the number of drivers on a policy has an unbalanced, almost counter-intuitive effect on premium pricing. Auto insurers are relying on non-driving factors to charge good low-income drivers more for a basic product they are required to carry by law. Insurance companies are engaging in discriminatory practices by using socioeconomic factors to set insurance premiums. Drivers with comparable driving records, experience, automobile use, and driving history pay more or less based on factor that are clear indicators of status and income.

Affordability of Limited Liability Auto Insurance in Western New York

The Law Center, along with nineteen other New York-based consumer advocacy organizations who are members of New Yorkers for Responsible Lending, submitted commentary to the Federal Insurance Office on the issue of the affordability of personal limited liability auto insurance. The Law Center and peers were motivated to comment based on the rising premiums charged to the community members they serve. The organizations primarily serve low- to moderate-income drivers across New York. The conglomerate support a rate of 2% of gross income should be adopted as a standard of car insurance affordability. The 2% standard recommended by New York consumer advocates is consistent with examinations conducted by the Federal Reserve and other governmental agencies for the average American expenditure on auto insurance. It was suggested that in order to properly evaluate affordability, the Federal Insurance Office would need to examine data similar to those collected in this study.

Considering this affordability recommendation, the Law Center evaluated the affordability of auto insurance in Western New York. The results were alarming across the median income of the region, \$46, 951.¹⁵ Based on the average regional income, car insurance premium costs ranged from 2.3% – 3% of gross household income. The actual prices charged to residents in these areas does not fall under the affordability measure of 2% until household incomes are raised to above 200% of the Federal Poverty line for a family of four. The insurance premiums hefted on Western New Yorkers are ominously high, considering the actual income in the region.

Perhaps the most disturbing findings were in the affordability measurements for low- to moderate-income drivers living in Buffalo, New York. Many Buffalo zip codes have median incomes that are well below half of the regional income, the lowest of which is \$22,572.¹⁶ Considering affordability across Buffalo's 18 zip codes, the auto insurance premiums as a percent of gross income ranged from 4% – 6%. This percentage rose significantly when considering incomes closer to the city average. A female driver with low socioeconomic status, in Buffalo, with gross earning at 150% of the Federal Poverty line, would allocate as much as 8.44% of her gross income to auto insurance premiums. Western New Yorkers are therefore paying noticeably more for auto insurance than the recommended proportion of gross income, and Buffalo residents pay the most.

Proposed Solutions to Eliminate Discrimination and Establish a Fair and Equitable Auto Insurance Marketplace in New York

It is clear that low- to moderate-income Western New Yorkers rely on their cars to operate in society. Roughly 88.5% of the labor force in the region relies on a car to get to work. Each driver is required by New York State to carry limited liability auto insurance, yet each driver is not treated equally in this marketplace. Auto insurers are using non-driving factors to determine car insurance premiums, so a person's insurance premium has little to do with their ability to operate a car and more to do with their income, education, marital status, and gender, among other factors. Subsequently, single, widowed, or divorced females, drivers with less education, lower status jobs, lower credit scores, drivers who are renters, and those with any temporary lapse in insurance coverage will pay substantially more for auto insurance in spite of a clean driving record.

The Law Center proposes the following actions in New York State to ensure that all drivers are treated equally in the auto insurance marketplace:

- The New York State Legislature should pass robust legislation prohibiting the use of socioeconomic indicators and non-driving factors in determining insurance pricing.
- The New York Department of Financial Services should continue to investigate practices and actively enforce existing rules to ensure that consumers are treated fairly in the insurance marketplace.

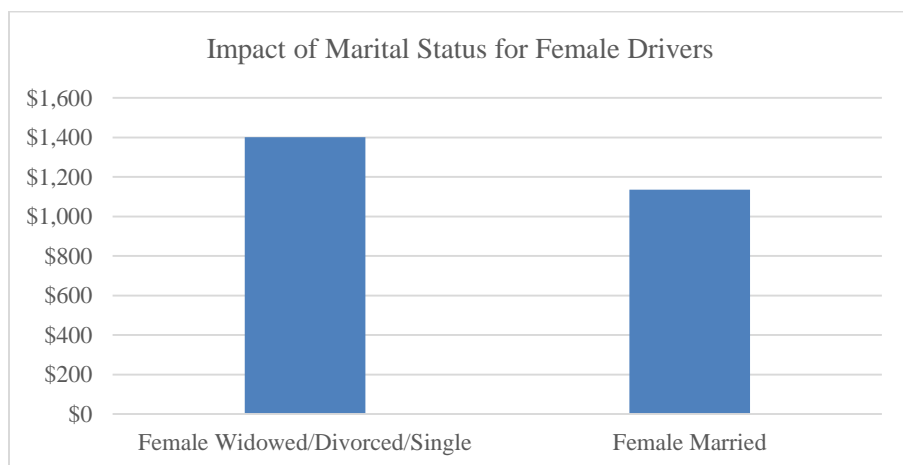
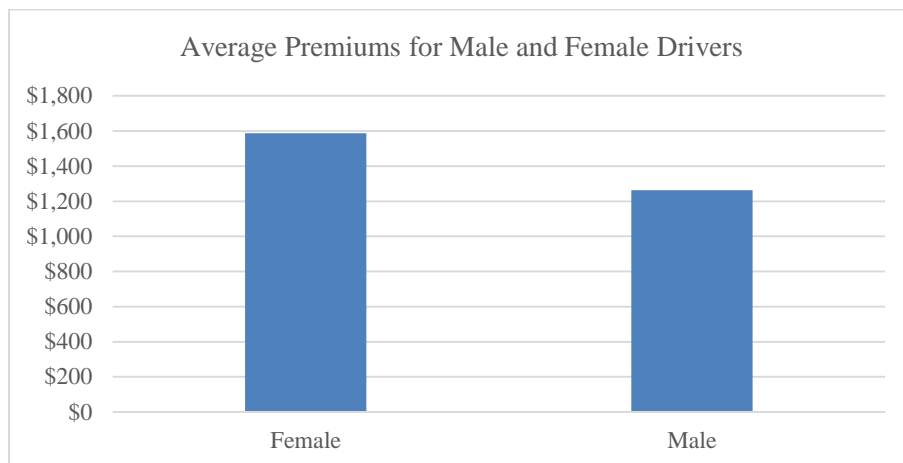
¹⁵ An average of the eight counties median income as found in the U.S. Census Bureau's 2010-2014 American Community Survey 5-Year Estimates

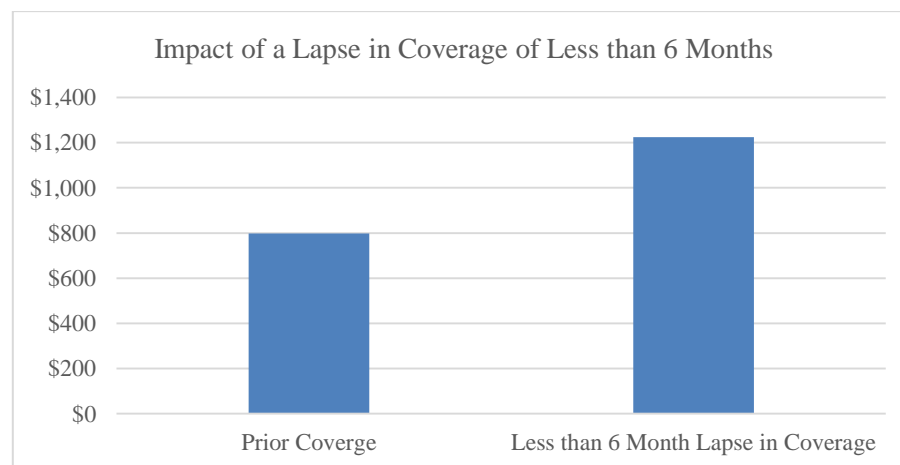
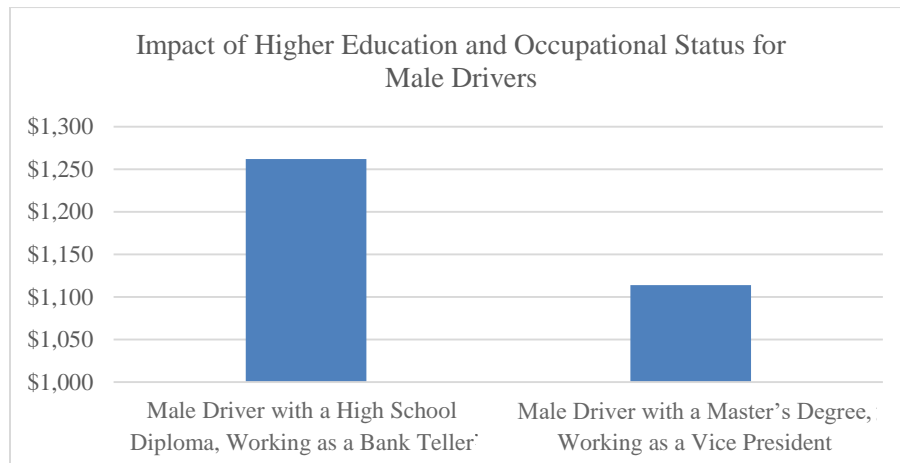
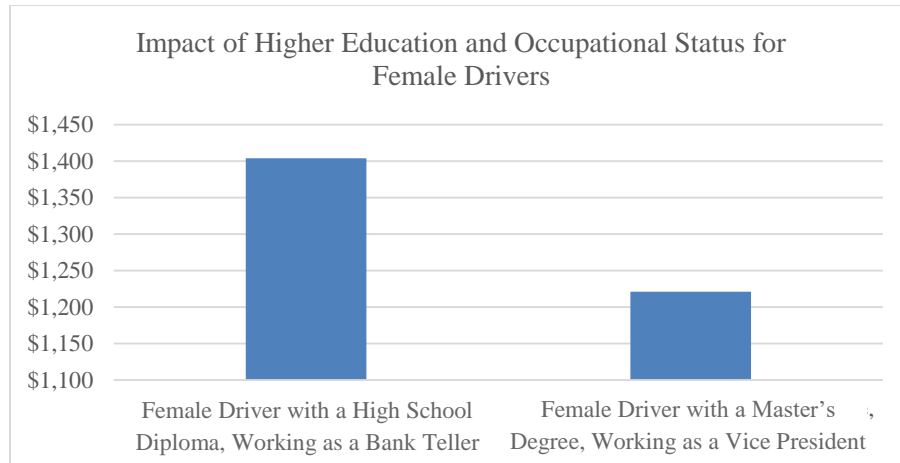
¹⁶ U.S. Census Bureau's 2010-2014 American Community Survey 5-Year Estimates

- The Law Center and other Consumer Advocates will continue to work in the community to raise public awareness of inequalities and ensure that all drivers' voices are heard by lawmakers and regulators.
- The Federal Insurance Office should continue to monitor insurance affordability and work to develop measures of affordability for regulators to use in order to ensure that limited liability auto insurance is affordable for all drivers.

Appendix A

Progressive Premium Factor Impact Graphs







Appendix B

Liberty Mutual Premium Factor Impact Graphs

