

**DRAFTER'S NOTE**  
**FROM THE**  
**LEGISLATIVE REFERENCE BUREAU**

LRB-0843/P3dn  
PJK:jld:nwn

May 2, 2007

After your review of this version, I think the draft will be ready for a complete analysis and introduction. I still have a few questions/comments:

In s. 631.20 (1) (c), I changed the suggested language from “a form first filed .... on or after the effective date” to a “form first used and not already filed under par. (a) .... on or after the effective date.” Since such a form is exempt from par. (a), which includes a filing requirement, it didn't make sense to me to say that a form first filed on or after the effective date is exempt from the filing requirement. Additionally, I assumed there may be a timing problem with saying that a form first used on or after the effective date is exempt from the filing requirement because a form may already have been filed by that date but not used until after that date. Is the provision, as I have drafted it, okay?

See the embedded NOTE regarding “30 days” following s. 631.20 (1m) (a) 1. and the embedded NOTE following s. 631.20 (6) (a) 2. I have removed all embedded NOTES from the previous version of the draft even though they were not addressed. I assumed that, if a NOTE was not addressed, no changes were needed.

Is it possible that some forms that are not exempt from s. 631.20 (1) (a) under s. 631.20 (1) (c) 1. to 11., such as long-term care insurance policy forms, would be exempt under s. 631.20 (1g)? In other words, could the interstate insurance product regulation commission approve a form listed under s. 631.20 (1) (c) 1. to 11.? If that is the case, we need to indicate which takes precedence. (The suggested language removed the “Notwithstanding sub. (1) (c)” language in s. 631.20 (1g) of the previous version.)

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