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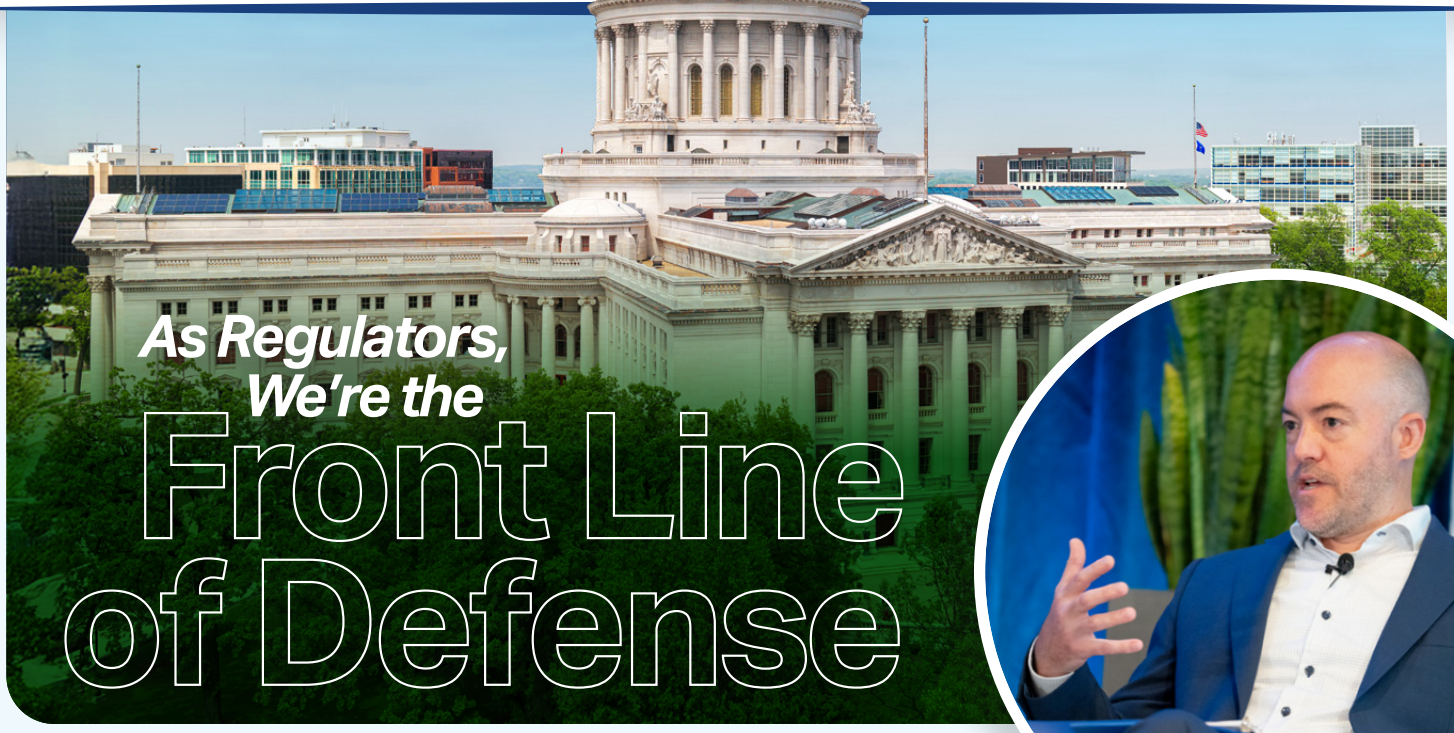

As Regulators, We're the Front Line of Defense

Nathan Houdek has served as Commissioner of Insurance for the State of Wisconsin since January 2022. He's also Chair of the NAIC's Financial Condition (E) Committee, Co-Chair of the Risk-Based Capital Model Governance (EX) Task Force, and a member of the Life Insurance and Annuities (A) Committee and the International Insurance Relations (G) Committee. He was kind enough to sit down with me during NOLHGA's 2025 Legal Seminar in July to discuss the key issues facing insurance regulators and the industry. The following is an edited transcript of his remarks.—Katie Wade

WADE: ***Before we get started, could you talk a little about your career journey and how you became Wisconsin's Insurance Commissioner? I'm not sure many children in America grow up thinking they're going to be the state insurance commissioner.***

HOUDEK: Well, a go-to conversation starter at receptions and happy hours is "how did you get into insurance," right? To your point, very few people plan to get into insurance—especially insurance regulation. It definitely was not something I had planned. It was kind of an accidental career journey.

I actually started in campaign politics early in my career. From there I moved into various roles with the Wisconsin state government for about a decade and then spent some time in private sector government relations. After Governor Evers was elected in 2018, I worked on his transition team. I had planned to take a different career path after the transition was finished, but I ended up getting a call from the personnel director during the last week of the transition. She asked if I'd be interested in meeting Mark Afable, who had just been named the new insurance commissioner.

I didn't know Mark at the time, but he and I hit it off immediately, and he offered me the position of deputy commissioner, which I accepted. I served with him for three years—which was a very challenging time with the COVID pandemic and everything related to that. When Mark stepped down at the end of 2021, the governor asked if I would be interested in serving as commissioner, and I've been in that role ever since.

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President's Column by Katie Wade

Shared Mission

Our cover story is a transcript of my interview with Wisconsin Insurance Commissioner Nathan Houdek at our July 2025 Legal Seminar. Commissioner Houdek touched on a wide variety of topics during our talk—AI, RBC, insurer investments, and closing the retirement gap, to name a few—but his comments about the relationship between state regulators and the guaranty system were particularly interesting:

> *We need to recognize that we are occasionally going to have company failures, that we can't regulate to a zero-failure system, and determine how we find that balance to allow for product availability and accessibility. I think a big part of that balance is knowing that we have the guaranty associations as a backstop.*

The guaranty system protects policyholders if their insurer fails (i.e., becomes insolvent or goes into liquidation). Commissioner Houdek makes a great point—our state-based system also backs up the state-based regulatory system. Regulators and the guaranty associations have a shared goal of protecting consumers when their insurer is financially troubled. None of us want to see an insurer fail, but when one does, we should work together to ensure that failure is addressed in the best possible manner for consumers.

As a former regulator (one who has overseen a liquidation), I have seen the importance of this partnership up close, and from both sides. The better we work together, the better the outcome for consumers. So, how do we strengthen and deepen this relationship?

One place to start is with the NAIC's GA Model Act, which has been adopted in all states and the District of Columbia. The drafters of the Act were guided by several principles, including:

- Policyholders should have certainty about the benefits they are entitled to receive.
- The liquidity of the industry must be maintained—guaranty association obligations are funded by assets of the company in liquidation and assessments on the industry.
- Delays should be minimized—claims should be paid as quickly as possible, and in some cases, there is continuation of coverage.
- Life and health and property and casualty products are different and should be handled accordingly.

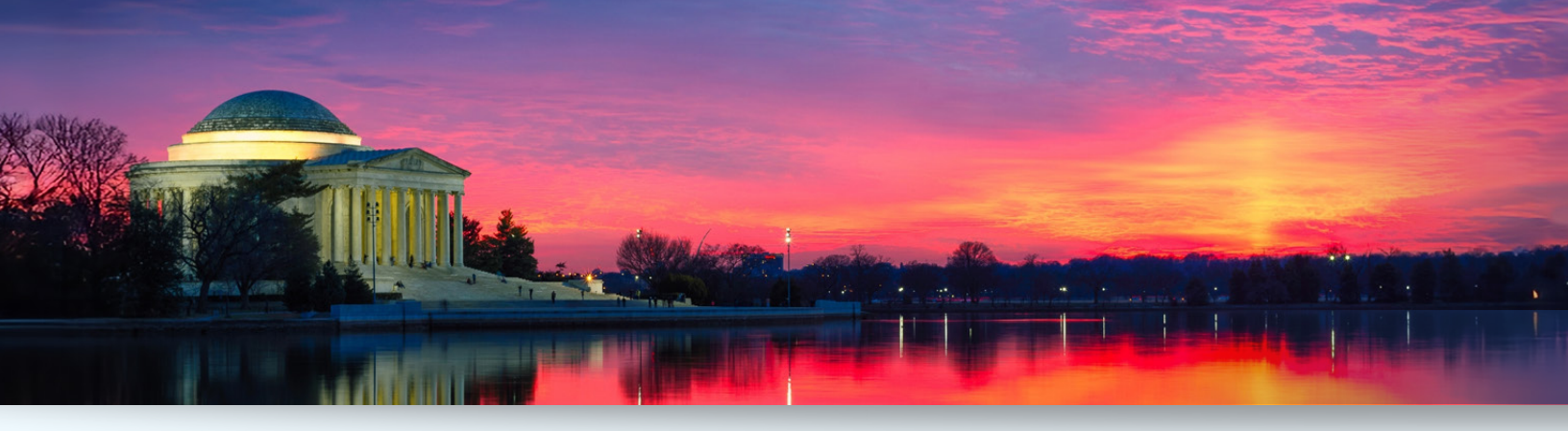
Our relationship with regulators plays a key role in all aspects of troubled company resolutions, but especially in that third point—minimizing delays. The best way to accomplish this is with early involvement of the guaranty system and a close partnership between the state guaranty associations and regulators in their role as the Receiver of a troubled company, as well as outside resources hired by the insurance department.

Strengthening this relationship was a key goal of the tabletop exercises Commissioner Houdek mentions in his interview. The exercises did more than simply go through a troubled company scenario. They revealed to all par-

ticipants, regulators and guaranty system representatives alike, that while we share a goal of protecting policyholders, we have different responsibilities and obligations as we pursue our common goal of consumer protection.

The tabletops and other discussions with regulators highlighted the fact that the guaranty system has a great deal of talent and experience—actuaries, lawyers, accountants, former insurance company management (with experience in the financial, operational, and claims management fields), and former regulators at a variety of levels—to work in partnership with regulators to help solve problems and find solutions to the complex challenges posed by insolvencies. Greater collaboration with regulators, and an appreciation of our shared goal of protecting policyholders, helps both insurance regulators and guaranty associations do their jobs even better. ✯

Katie Wade is NOLHGA's President.



["As Regulators, We're the Front Line of Defense" continues from page 1]

WADE: ***Protecting retirement savings has been one the NAIC's main priorities for a long time. Can you talk about what the NAIC is doing on this important issue?***

HOUDEK: We know that not enough people in this country have sufficient retirement savings. It's an issue that's top of mind for us as insurance regulators. I'd say we view it as a three-part approach. Number one is protecting consumers at the point of sale. A few years ago, the NAIC adopted the annuity best interest law, which just about every state has now adopted. That law ensures that when consumers are purchasing annuities, those annuities are suitable and in the best interest of the consumers. That's an important consumer protection.

Obviously, what we're here to talk about today—company solvency, making sure companies remain financially strong so they can meet their long-term commitment to policyholders—is a key piece of our approach. And then there's the need to balance the regulatory requirements, including capital requirements, with ensuring the availability and affordability of retirement products. We are very conscious of not putting in place overly restrictive or burdensome regulations because we know it's important for companies to offer a variety of products to meet the retirement needs of people. Those are the three approaches we take: protecting consumers at the point of sale; ensuring companies remain financially solvent; and finding a regulatory balance that allows for a variety of retirement products to be available and affordable.

One thing [former NAIC President] Andy Mais often talks about is closing the protection gaps. And one of the issues related to protection gaps is obviously the retirement savings gap. That means supporting financial literacy initiatives and

> "We've seen life insurers getting more aggressive in terms of the types of assets they're investing in—more private credit, asset-back securities, structured securities."

making sure people are aware of their retirement needs and what products are available to help meet those needs. It's also about supporting innovation, whether it's a new product offering or new forms of distribution, by leveraging technology—like the use of accelerated underwriting. And then also looking at supporting potential changes to federal or state laws to incentivize people to purchase retirement products, whether it's changes to tax law or the need to modernize based on technological advancements. We recognize that sometimes laws and public policy can restrict people's ability to purchase the products they need.

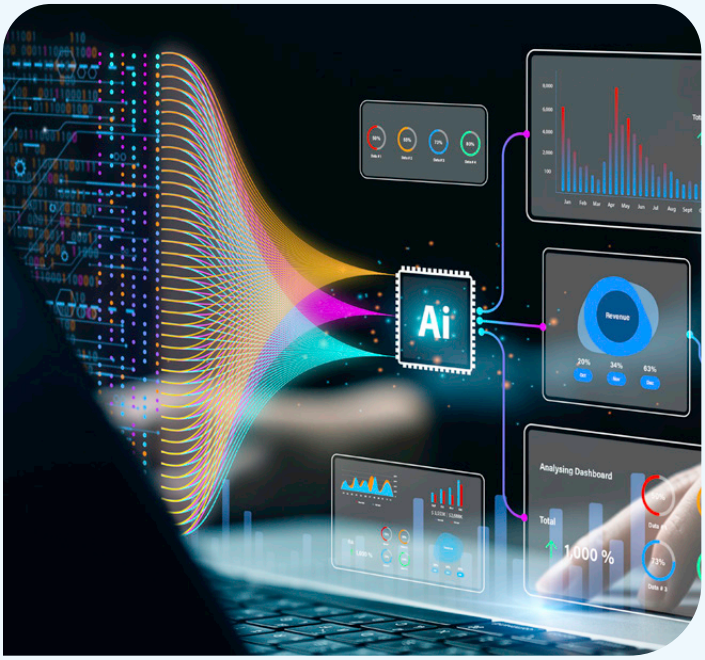
WADE: ***Big data and artificial intelligence is a big topic—we recently formed a committee to help us look at the implications to our system. I know the NAIC has been spending a lot of time on it as well. Recently, there's been a request for information from stakeholders regarding the possibility of a model law on this topic, and roughly half the states have adopted the AI bulletin. Can you talk to us about what the NAIC has accomplished and where you see this going?***

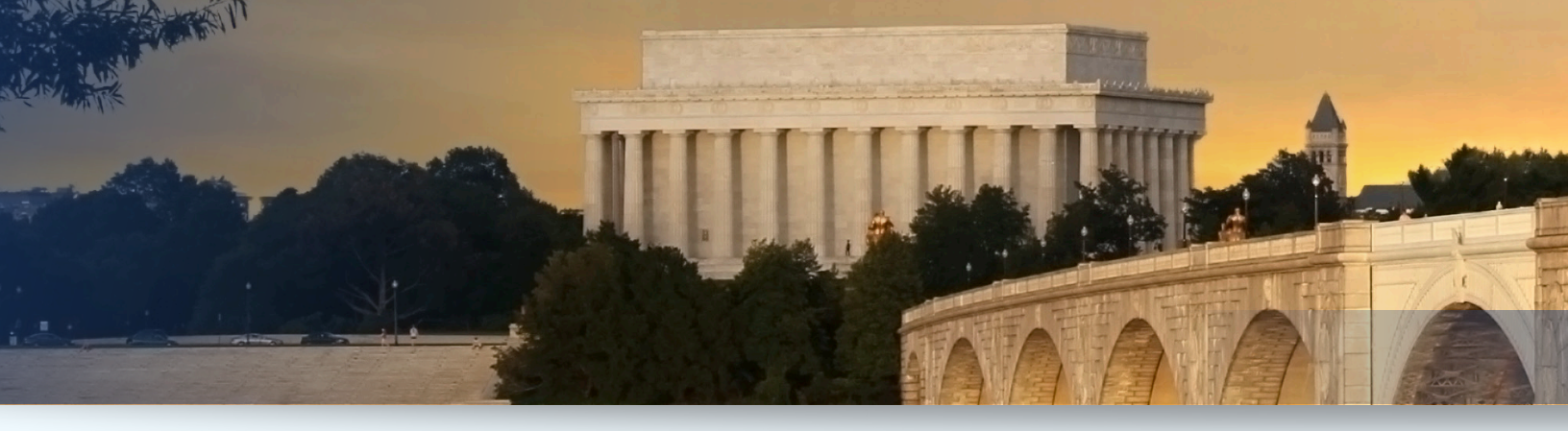
HOUDEK: I would say that we've taken a multi-step approach. First, it's important to understand how companies are using AI. We've done that through a series of data calls—starting with private passenger auto and then, I believe, homeowners and then life and health. We want to understand how companies in each of those product lines are utilizing AI, which then helps inform us as regulators as we consider what regulatory changes might be needed.

Second, we want to understand how current laws and regulations apply to the use of AI. That gets at the model bulletin that was developed a couple years ago; as you mentioned, it's been adopted by about half the states. That bulletin is really focused on providing guidance to companies when they're using AI—how to comply with existing laws and regulations. I don't know if we are the most recent state, but Wisconsin adopted the bulletin a couple months ago.

The third piece of this approach is providing tools and ensuring that regulators have the knowledge, skills, and resources they need to appropriately review and assess the use of AI. I previously served as chair of the Accelerated Underwriting Working Group, and one of the main activities of the working group was to develop guidance on how regulators can review accelerated underwriting models. That guidance is now being operationalized through the *Market Regulation Handbook*. The Big Data and AI Working Group is also developing a broader regulatory toolkit for how to assess the use of AI more generally. And I should mention the Privacy Protections Working Group, which continues its work on updating the Privacy Model Law.

With regard to a potential new AI Model Law, that's still in discussion. We're still trying to understand where all the states and the NAIC membership stand overall, in terms of supporting a new model law. You mentioned we had the request for information. I believe the responses have come in. I'm not sure if the responses are public yet, but I think everyone in this room who engages with the NAIC and understands the different perspectives that states have won't be surprised to know that there's some disagreement. Some states want to be more aggressive and are being more aggressive at the state level. You have those





> I think a big part of that balance is knowing that we have the guaranty associations as a backstop. If we don't get it right, if something falls through the cracks and there is a company failure, at least we know there will be protection for policyholders.

states that feel the NAIC should be more proactive in terms of developing a model law, and then you have some states that feel it's not necessary—if individual states want to take more action, that's fine, but that's not something we should be doing at the NAIC. We'll see how that discussion continues to play out.

WADE: ***The Big Beautiful Bill is now the law of the law of land. There had been a moratorium on state AI laws in the bill, but it was removed from the final version. Did the NAIC play a role in lobbying on that issue?***

HOUDEK: Yes, the NAIC was very active on that issue. Every year, we do a "fly in" to Capitol Hill and meet with our respective congressional delegations to discuss the relevant hot topics. I believe the House bill, which included that moratorium, had just come out when we did our fly in back in May, so that was a topic we discussed with our congressional delegations to express concern with the moratorium language. And subsequent to that, the NAIC officers sent a letter to congressional leadership—the letter is posted on the NAIC website—expressing concerns with that language. We then followed up with a number of individual calls and meetings with congressional members and staff, and we also worked with other associations of state officials—NCSL, NCOIL, and others—in our advocacy efforts. And ultimately, that language was removed.

WADE: ***Later today, we're going to have a panel on insurer investments. As Chair of the Financial Condition (E) Committee, you're very engaged in the work to enhance regulatory oversight of insurer investments. Can you talk about why this work is important?***

HOUDEK: I think everyone in the room knows the background and the narrative coming out of the great financial crisis. We had a prolonged low-interest-rate environment. We also had stricter regulations on banks, which resulted in banks pulling back on lending. As a result, we saw insurers—especially life insurers—get more aggressive in their search for yield, and we also saw an increase in private equity moving into the insurance space.

Those two trends have continued in recent years. We've seen life insurers getting more aggressive in terms of the types of assets they're investing in—more private credit, asset-back securities, structured securities. From the regulatory standpoint, that brings more complexity, less transparency, and some concern about understanding the potential investment risks associated with these new asset classes. While the overall holdings haven't risen to a point of

being materially concerning, the overall growth has resulted in regulators taking several steps to account for the risk associated with these new asset classes that's starting to build up in insurer investment portfolios.

There's a balance. We have to ask ourselves: What issues do we have to take into consideration as we wrestle with these growing investment risks? It comes down to making sure that our regulatory framework is able to assess and account for the risk associated with these new assets. We know there's a benefit related to a lot of these assets from a long-duration, asset/liability matching standpoint. But there's also a liquidity risk that comes with them. Understanding how that risk could play out in the event of a market downturn or an economic shock is critical.

Obviously, we're seeing an increase in private credit, and there's some concern about credit risk associated with that asset class. Again, in terms of how these assets are structured—which can be opaque and complex—there's some valuation uncertainty, that risk that comes from potentially not understanding the true value of these assets, especially if they do have to be sold in a market downturn.

Then there's this broader concern of what I'll call "herd behavior concentration risk," where you have the bigger companies—especially bigger private equity–backed companies—that have been leading the move into more of these asset classes. What we've seen over the last few years is a lot of other companies starting to follow suit—which raises concerns about companies having the appropriate knowledge and understanding of what they're investing in, as well as concentration risk if we're seeing a lot of companies investing in the same type of assets.

There's also some debate about the role of rating agencies. If we take a step back, at the NAIC's 2023 Summer National Meeting, we exposed what we refer to as the "investment framework." There are several components related to that framework that are driving the work we're doing to better understand and assess investment risk, and a key piece of that is more oversight of ratings provided by credit rating providers, or CRPs. We're trying to move from blind reliance on ratings to what we call "informed reliance." We still very much plan to rely on ratings from CRPs. We're not trying to displace them or their role in the process. But again, this is related to the increased complexity and lack of transparency of these new asset classes.

The way the system worked before, a CRP would provide a rating for a security, and that rating translated directly into an NAIC designation, which then had an impact on required capital for that company. That process works when you have assets that can be verified and validated by the public markets. As we've been seeing more of a move toward the private markets, private credit, etc., we don't have that same level of comfort about the quality or accuracy of those ratings. So, we are putting in place more oversight of the CRPs to ensure that we have a level of comfort with the accuracy and quality of private asset ratings.

It's kind of a two-part approach. The first was implemented last year. It's commonly referred to as the Securities

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Valuation Office, or SVO, discretion proposal. It essentially gives the SVO discretion to conduct a closer review if there's a rating they think might not be accurate. And there's a very prescriptive, multi-step process that has to be followed. We went through about a two-year process led by the Valuation of Securities Task Force with a lot of comment periods, a lot of industry feedback, to end up with the final proposal. And that's now in the process of being operationalized. By the end of next year, hopefully, it'll go into effect.

The second part, with regard to more oversight of the CRPs, is what we refer to as the "due diligence framework"—developing a set of qualitative and quantitative criteria by which the CRPs have to abide to participate as CRPs and have their ratings translate to NAIC designations. We've engaged PwC to help with that work, and they're in the process of collecting data to build out the front end of that due diligence framework.

I can't say this enough, we still plan to rely on the CRPs. We're not planning to displace them. None of this is an effort to discredit any of them. I think approximately 80% of securities are rated by the CRPs, and we anticipate that will continue.

Cross-border reinsurance is also a hot topic. This issue was really elevated back in 2022, when the Macroprudential Working Group released its 13 considerations applicable but not inclusive to private equity–owned insurers, and one of those was cross-border offshore reinsurance. Since that time, a lot of work has taken place on this topic.

Last year, the Reinsurance Task Force adopted a reinsurance worksheet that U.S. regulators can use when reviewing these offshore reinsurance transactions—questions to ask and things you need to be thinking about before you approve the transactions. A lot of that work is now taking place under the Life Actuarial Task Force; the adoption of the new actuarial guideline really focused on understanding the risks associated with this business being ceded offshore, in particular the related cash flow. There's some concern that once the business is ceded, the total amount of assets is actually decreasing. U.S. regulators want to gain a better understanding of how those transactions are structured and ensure that the assets are sufficient once the business is ceded offshore.

And this issue isn't just a focus for the NAIC. The International Association of Insurance Supervisors (IAIS) is working on a white paper focused on structural shifts in the life insurance sector. The two main areas of focus for that paper are the increase in alternative assets that I mentioned earlier and asset-intensive reinsurance, or AIR. That's AIR that's going offshore, primarily to Bermuda and to the Cayman Islands to some degree as well. This is really

a topic of interest across jurisdictions, and it's something I think we'll be talking about for some time.

We meet regularly with the Bermuda regulators. The Bermuda Monetary Authority (BMA) has been very responsive to some of the concerns raised by U.S. regulators, particularly in recent years. Last year, the BMA implemented a number of regulatory enhancements to address some of those concerns. The BMA has really been a good partner in terms of working with the United States in making sure those concerns are addressed.

WADE: ***You co-chair the Risk-Based Capital Model Governance Task Force, which has been focusing on governance principles designed to improve consistency across the states on RBC oversight. Part of that work involves enhancing the messaging around the U.S. solvency regime. Can you talk about that?***

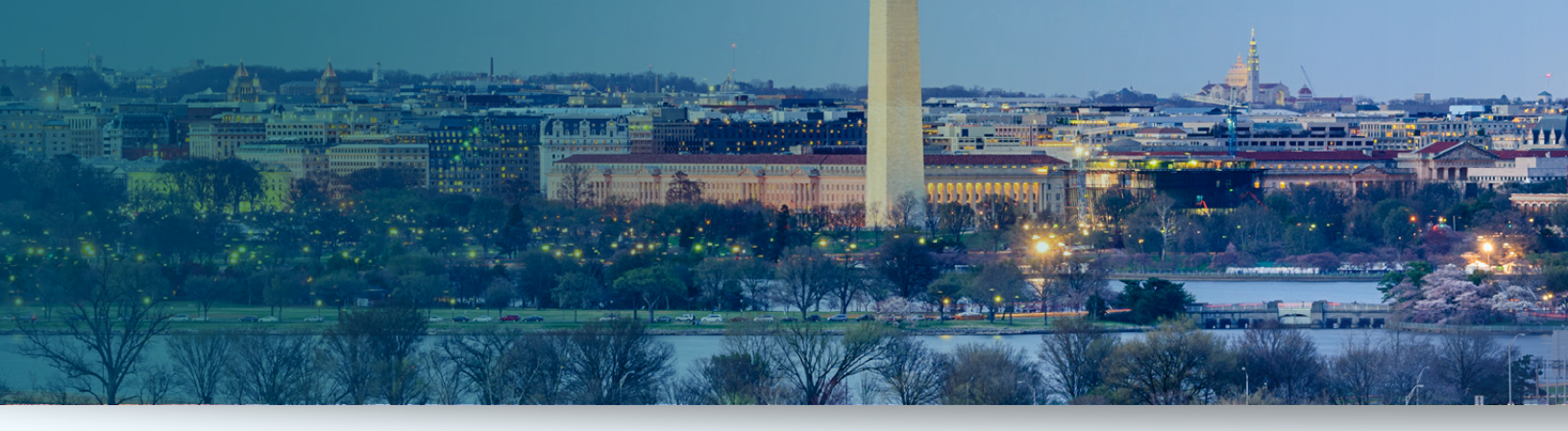
HOUDEK: For anyone who isn't aware, the new RBC Model Governance Task Force was just created this year. It's an executive level task force, which means the NAIC officers developed it to report directly to the Executive Committee of the NAIC. It was done to recognize the need for a more consistent approach to how we make changes to our RBC framework, especially in light of the new asset classes and investment risks we just discussed.

The task force has three main charges. The first is to develop a set of principles that will guide how we make changes to our RBC framework going forward. The second is to perform a gap analysis of the RBC framework to identify any gaps or inconsistencies in the framework. Not to say that the inconsistencies are bad in every case, but there's a recognition that since RBC was created in the early 1990s, there has never been a comprehensive effort to look at RBC to see where we may need to make some changes to have more consistency or uniformity.

And then the third charge is what you mentioned—to develop a public messaging campaign, both domestically and internationally. Domestically, I think anyone who watched the debate play out a couple years ago on the interim charge for residual tranches of collateralized loan obligations remembers that it was a pretty messy debate. In retrospect, I think people realized that not having principles in place for people to understand why we're making this change and the process we followed to make the change led to a lot of differing opinions. If we have a little more uniformity and we know how to talk about the role of RBC, hopefully we can prevent some of that disagreement going forward by making sure people understand when a change is needed and why it's needed.

Also, when we're talking with media outlets or on industry panels, having a set language for how we talk about our solvency framework and the role of RBC in that framework will be helpful. I think it would be beneficial for regulators—especially commissioners, where you have new people coming in every few years.

Internationally, as we've seen the discussion and debate over the development of the insurance capital standard (ICS) play out over the last few years, I think there's been some frustration among U.S. regulators who have been involved in those discussions. Or maybe it's just a recognition that other jurisdictions, especially in Europe, don't really understand RBC or how our broader solvency framework works. As we continue to be deeply involved in these international discussions—moving into ICS and the aggregation method (AM) implementation—developing a common language, really making sure everyone is well versed in explaining RBC, will be beneficial.



WADE: ***We've touched on some international topics, and often I get asked, "why should we care about what's happening internationally," in the industry and particularly for the guaranty association system. Can you talk a little bit about why these issues are important?***

HOUDEK: Before I became more involved with international work over the last year, frankly, I had a similar attitude, but it really is critical because insurance is a global business. Yes, we regulate our domestic market, but U.S. companies are increasingly involved in international jurisdictions, and foreign companies are involved in business here in the United States. Understanding those jurisdictional differences in insurance supervision and regulation is critically important.

In much the same way that the NAIC serves a role in terms of ensuring convergence and compatibility in our regulatory approach across the United States, the IAIS plays a similar role internationally to ensure there's as much uniformity as possible by developing a set of standards, doing financial stability monitoring, etc.

Implementing the ICS is a good example. It's important for U.S. regulators to be at the table when those standards are being developed—knowing they're going to be implemented in other jurisdictions around the globe but also understanding where there might be differences in our regulatory and supervisory systems.

The IAIS is looking at standards on resolution and recovery. In addition, the European Insurance and Occupational Pensions Authority (EIOPA) just released several papers for comment on resolution and recovery planning. These are intended to guide the EU member states as they develop their insurance regulatory schemes. How do we work together to ensure that these international standards recognize the differences in our system? It's an increasingly hot topic in the international community. It's important for all jurisdictions to have recovery and resolution plans in place to avoid market disruption and make sure that policyholders are protected in the event of a company failure.

We are very fortunate that we have the guaranty system in the U.S. We're ahead of a lot of international jurisdictions by having that system in place. But it's important for us to be involved in discussions that are happening internationally to understand how different jurisdictions are taking different approaches to recovery and resolution, recognizing that a one-size-fits-all approach is not the way to go.

It's also important to have those relationships so that if you do have a troubled international company, we can talk to people in other jurisdictions. It's being at the table, understanding how these new processes and structures are being developed and where the differences are, and making sure we keep open lines of communication through that process.

> Last year, the Reinsurance Task Force adopted a reinsurance worksheet that U.S. regulators can use when reviewing these offshore reinsurance transactions—questions to ask and things you need to be thinking about before you approve the transactions.

WADE: ***Switching to the guaranty system, we've recently had a presentation and an article in our publications about working with your state insurance department. Can you talk about how you work with the Wisconsin Insurance Security Fund and the benefits of that relationship?***

HOUDEK: We have a great working relationship with the Security Fund in Wisconsin. I serve on the Board—I don't know if commissioners do that in every state. I try to attend as many of the Board meetings as I can. If I can't, we always have someone from our office attend. We're also in regular communication with Allan Patek, the Security Fund Executive Director, and his team as issues arise.

For example, we draft what we refer to as a technical bill during every legislative session. We work with our stakeholders in Wisconsin to gather input on any technical statutory changes they want to see made. We always reach out to Allan and the Security Fund to get suggestions. During the last session, one of the provisions in the technical bill was to allow more confidentiality in the information that we share with the Security Fund because we want to be able to share information, but we also need to make sure we have the proper statutory protections in place.

WADE: ***In partnership with the NCIGF, our property and casualty counterpart, NOLHGA has been working for a number of years to engage in dialogue with regulators on how we can work together better to protect consumers. We each have our own statutory role, but we share the common goal of protecting consumers when a company gets into trouble. What else could we be doing in this space to continue to improve the partnership?***

HOUDEK: The tabletop exercises that have been held at various NAIC meetings have been very helpful. It's important to show up, have open lines of communication, educate people—especially because you always have new commissioners—on the role of the guaranty system and who they can turn to as solvency issues arise. All of that is extremely helpful. I know the NAIC updated its *Receivers' Handbook* recently to encourage early communication, and there are regular discussions to make sure that happens.

As regulators, we're the front line of defense in terms of protecting policyholders by ensuring companies remain solvent. But when that line is breached, that's where the guaranty system comes in. Guaranty associations serve as a backstop to protect policyholders in the event of a breach.

> There's a recognition that since RBC was created in the early 1990s, there has never been a comprehensive effort to look at RBC to see where we may need to make some changes to have more consistency or uniformity.

In our work with the E Committee, one of the things I often talk about is the right balance of regulation. You could regulate to a zero-failure system, but that's going to result in a loss of products on the market, right? Because you're going to have an overly burdensome regulatory system, and companies won't offer certain products. That ultimately will be to the disadvantage of consumers. And frankly, we see some of that in the approach Europe is taking with some of their capital requirements and their regulatory approach.

We need to recognize that we are occasionally going to have company failures, that we can't regulate to a zero-failure system, and determine how we find that balance to allow for product availability and accessibility. I think a big part of that balance is knowing that we have the guaranty associations as a backstop. If we don't get it right, if something falls through the cracks and there is a company failure, at least we know there will be protection for policyholders.

Unfortunately, in my short time at the department, I've had a couple real world examples with Time Insurance Company and Wisconsin Reinsurance Corporation. And having good lines of communication with the Security Fund in Wisconsin has been very helpful in dealing with those situations.

And there's another question of balance—when do we communicate with the Security Fund? Until we're at the point of company action level or the department taking over the company, it's still management running the company. We have to be cautious about not overstepping our authority and sharing information too early. Finding that balance is important as well.

WADE: ***You've been Deputy Commissioner, and now you've been Commissioner for a while. What has surprised you the most?***

HOUDEK: I mentioned earlier that I came to the department from the public policy and regulatory affairs space. I hadn't worked at an insurance company. I didn't really understand the operational side of insurance. There have been many times where I've thought, "I wish I would have known more about this topic or that topic." I used to be more cautious about admitting this, but I'm in year seven, so I think it's OK. I spent most of my first year in meetings writing down things I had to Google after the meeting.

I guess my point is, there's no way you come into this job knowing everything. Even if you're an expert in one aspect of insurance, there's just so much to this job that you're never going to know everything. You learn to be comfortable with that to a degree: "I'm not going to have all the answers, so I need to know who to go to." Whether it's someone in my department, someone at another department, or someone at the NAIC. Just recognizing that while we are individual state jurisdictions, we really have this network of people

who work together and who we can rely on to help us do our jobs well. That's something I've learned.

The other thing is understanding the time commitment of projects you take on. As a commissioner, there's no limit to the things you could be involved with. I used to work at a consulting firm, and one of my colleagues would always tell clients, "we can do anything you want, but we can't do everything you want." As a commissioner, you can do just about anything—focus on this issue or that issue, join this organization or that committee. But it's important to be careful, because those time commitments just keep getting bigger and bigger.

AUDIENCE QUESTION: ***You touched on one of the goals of the RBC Model Governance Task Force, that education function. You also touched on how the guaranty system is such a crown jewel. Do your international counterparts understand that? And if not, do you anticipate making the success of the U.S. guaranty system an integral part of that education effort?***

HOUDEK: We haven't gotten down to that level of detail yet, but at a higher level, we recognize that a lot of our counterparts, especially our European counterparts, see the RBC company action level as the only time that regulators take action to address a solvency concern. They don't understand all the other regulatory tools that are in place, or the fact that domestic regulators are talking with their companies constantly, or the analysis and examination process and all these other things that take place. We've been discussing how we can talk about the full range of solvency tools that we have. To your point, bringing in the role of the guaranty associations and their part in the broader regulatory structure could be an important part of that messaging.

Some international regulators see the RBC company action thresholds, and they seem to think we're just sitting back not doing anything until one of those is breached, and then we step in and take action, which we all know is not the case. There's no recognition of how much regulators engage with their domestic companies. It's not all about standards and regulations—there's regular dialogue around what's going on, in good times and absolutely in bad.

When we talk about the messaging, we want to be able to explain what RBC is and how it works, but it's broader than that. It's what we're doing to make sure companies are staying financially strong to prevent insolvencies. It's the regular interaction with management at all levels. Internationally, I don't think there's an appreciation for how much that occurs. ★

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