



March 8, 2021

Transportation Committee
210 Capitol Ave.
Harford, CT 06106

RE: Testimony in opposition of HB 6568 An Act Concerning Peer-to-Peer Car Sharing Programs

Dear Chairs and Ranking Members of the Transportation Committee,

Thank you for the opportunity to appear before you on the matter of HB 6568. Your time, effort and consideration are sincerely appreciated. During my testimony on March 8th, I hope to convey serious concern with the way HB 6568 is currently drafted.

I want to recognize that this may be the first time some members of this committee have heard of Turo. Let me take a brief moment to explain how our product works. Turo is the largest peer-to-peer car sharing marketplace that provides individual car owners in Connecticut, also known as "hosts" on the Turo platform, to share their cars with guests in search of a mobility option.

Let's say you wanted to take a trip up to Cornwall for the weekend and wanted a nice roomy SUV for the drive up. Using the Turo app, all you would need to do is select your pick-up and drop-off location, and how long you need the car for. With this information, a list of available cars in your area will be curated, along with their daily rates.

Once you find a car that fits your needs you book the car and message your host to exchange the car keys. On the day of the reservation, the host will walk you through the nuances of the car and hand you the keys. This is a peer-to-peer transaction. You then can drive off and enjoy your weekend away. Once the reservation is complete, you bring the car back and hand over the keys back to the host.

It's important to note that Turo does not own or maintain any of the cars on the marketplace. These cars are owned by the men and women here in the state of Connecticut and elsewhere. These cars are owned by an amazing network of moms and dads, students and workers across the nation that make up the very fabric of our peer-to-peer car sharing marketplace.

To be clear, car rental and peer-to-peer car sharing are fundamentally two different industries. This point was only further proven in 2019, when the National Council of Insurance Legislators (NCOIL) passed model regulatory legislation pertaining to peer-to-peer carsharing.

During this process, stakeholders from the peer-to-peer car sharing, traditional rental car, and the insurance industry including the American Property and Casualty Insurance Association (APCIA), and the National Association of Mutual Insurance Companies (NAMIC) were brought together to discuss and address insurance, consumer protection and safety concerns and obligations. While it was a long and tiresome negotiation, it produced a carefully crafted final product that would serve as the model legislation recommended by the National Council of Insurance Legislators (NCOIL) to regulate the peer-to-peer car sharing industry. This model language made an important clarification and defined peer-to-peer car sharing as a separate and distinct industry from the traditional rental car industry.

The legislation in front of the committee here today unfortunately is not the adopted NCOIL model legislation for peer-to-peer car sharing. The NCOIL model legislation was specifically created to address regulatory needs and inclusion of anything beyond what is addressed in this model legislation undermines the intent of the NCOIL model bill. Airports already have the authority to govern the use of their premises and seek permits and other contracts. The language in this bill is punitive to one industry, does not solve a current problem, and wrongfully categorizes peer-to-peer car sharing as a rental car company. In fact, Turo is currently in conversation with Bradley International Airport to discuss a fair and appropriate permit. We continue to remain committed to engaging with the airport and work in good faith to reach an agreement.

Again, I want to highlight that the National Council of Insurance Legislators Model Bill has been thoroughly negotiated with all relevant stakeholders. Instead of a piecemeal approach, we encourage the legislature to adopt this national model that addresses consumer protections, defines peer-to-peer car sharing, establishes the appropriate insurance requirements for peer-to-peer car sharing transactions, and addresses the safety regulations for peer-to-peer car sharing transactions.

On behalf of Turo, I kindly urge the committee to uphold the original intent of the NCOIL model legislation and amend HB 6568 to the language that was collectively negotiated by all relevant stakeholders.

I look forward to speaking with you and fielding any questions you may have. Thank you for your time, effort and consideration.

Sincerely,

Kinza Malik
Turo, Inc.
kmalik@turo.com

