

**From:** Melissa Grandon <[Melissa.Grandon@acuity.com](mailto:Melissa.Grandon@acuity.com)>  
**Sent:** Thursday, March 14, 2019 4:16 PM  
**To:** Romero, Mariano, OSI <[Mariano.Romero@state.nm.us](mailto:Mariano.Romero@state.nm.us)>  
**Subject:** [EXT] NM ADC 13.4.8.1. et seq

I respectfully submit the following written comments in regard to NM ADC 13.4.8.1 et. seq.  
14.3.8.8 LICENSE REQUIRED

F. Each licensee who is a resident of this state or a business entity organized under the laws of this state shall:

" (1) A business entity must maintain a place of business in this state which shall be easily accessible to the public and is the place where the adjuster principally conducts transactions under the license; an individual licensed independent or staff adjuster, must maintain a residence in the state and must provide a business address of the carrier for whom the staff or independent adjuster are assigned;"  
The reason for this consideration is the address of the independent or staff adjuster may not coincide with the carrier of record. Furthermore, many adjusters work from their residence and as such do not have a business office. While the need to preserve records is necessary, the majority of files and documents are stored electronically. And the duty to maintain records is addressed separately.

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G. Approval

(5) if applying for a resident license, the applicant has passed the required examination, or if applying for a nonresident license, the applicant has passed the required examination in the applicant's home state or designated home state.

(a) if the applicant is a staff adjuster, the applicant may apply for a trainee license which will apply for 180 days from the date of application. The trainee staff adjuster will apply under the signature of the insurance carrier, and the application will be cosigned by a licensed manager or company designated trainer.

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I request consideration of a licensing option of Workers' Compensation licensed adjuster. This is an area of specialized claim handling that property claim handling knowledge does not apply nor does it benefit the public.

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Thank you for your time and consideration.  
Sincerely,

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