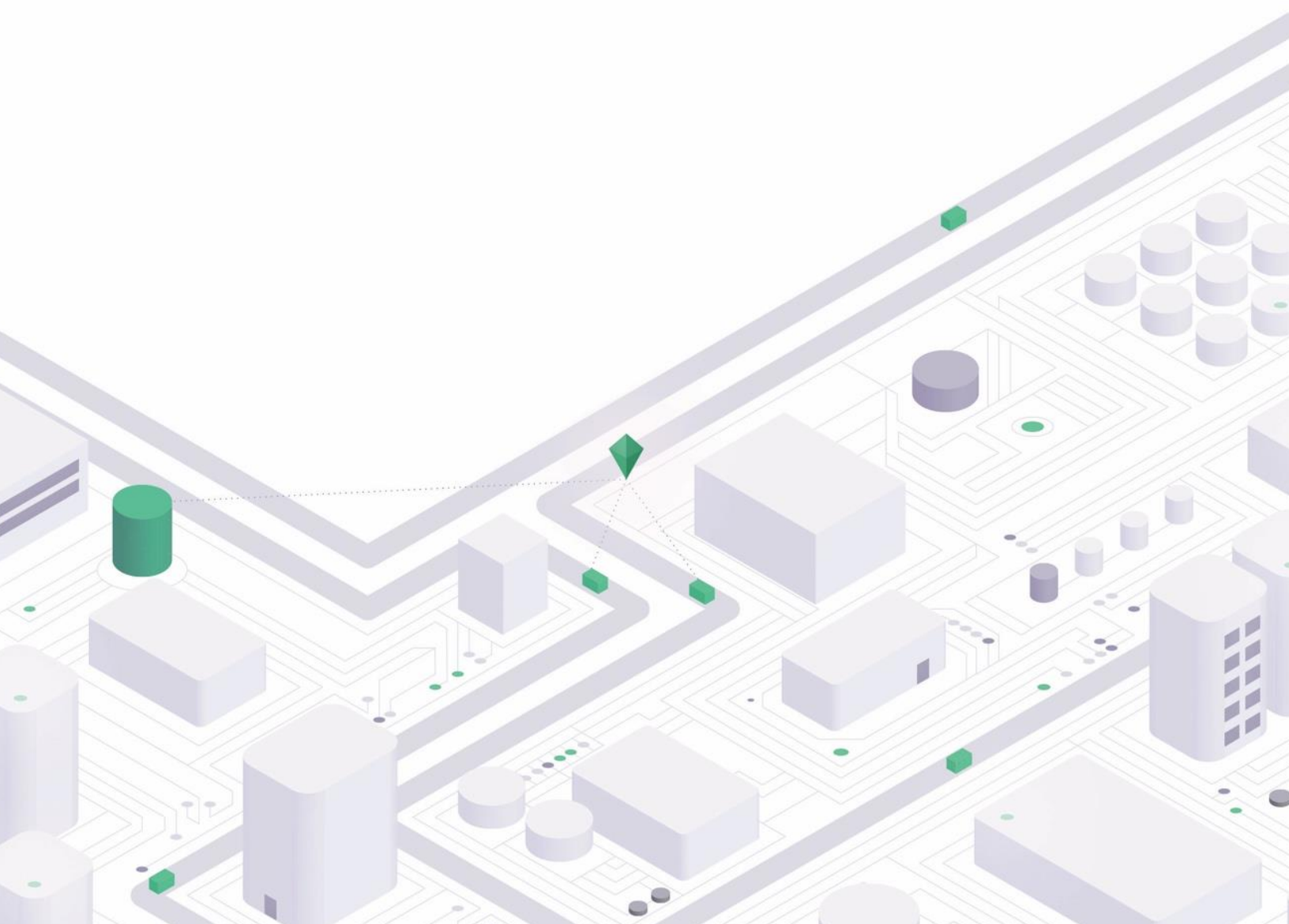




Explanatory Memorandum

Safety Score 1.1



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Introduction

Telenav, Inc. (Telenav), a licensed Rate Service Organization, submits the enclosed rule filing for its Safety Score 1.1 private passenger type telematics vehicle score. The Safety Score is intended to be used by subscribing insurers in rating and/or underwriting for personal auto insurance programs to better match rate to risk. The proposed effective date of this model filing is Sep 15, 2026.

Subscribing insurance companies are responsible for managing their telematics programs and supporting their use of the Safety Score 1.1 through their own regulatory filings.

Confidential Enclosures

- Model Memorandum
- Exhibit A - Scoring Examples
- Exhibit B - Pearson Correlation Matrix
- Exhibit C - Sample Records
- Exhibit D - Model Coefficients
- Exhibit E - Sample Scoring Calculations
- Exhibit F - Score Stability

Model Memorandum

Model Memorandum describes in detail the development and validation of the Model used to create the driving score, including its intended use, data used in modeling, model variables and coefficients, and how the Model results were validated.

Exhibit A - Scoring Examples

Exhibit A - Scoring Examples contains examples of how the Safety Score 1.1 is computed from data collected at the vehicle level.

Exhibit B - Pearson Correlation Matrix

Exhibit B - Pearson Correlation Matrix contains the Pearson correlation matrix for the variables used in the Model.

Exhibit C - Sample Records

Exhibit C - Sample Records contains sample data records.

Exhibit D - Model Coefficients

Exhibit D - Model Coefficients contains the coefficients and p-values of the variables used in the Model.

Exhibit E – Sample Scoring Calculations

Exhibit E - Sample Scoring Calculations contains scoring examples for 10 anonymized risks, showing the input variables, intermediate calculations, and final Safety Score outputs.

Exhibit F – Score Stability

Exhibit F - Score Stability contains an analysis of score stability across increasing mileage windows, showing that scores stabilize as driving data accumulates.



Telenav, Inc.
Safety Score 1.1
Wisconsin

Request to Maintain Data as Trade Secret Information
September 2026

To Whom It May Concern,

Telenav, Inc. (Telenav) is requesting that the confidential filing materials identified below be treated as proprietary and confidential pursuant to section 134.90, Wis. Stat.

Supporting Information	Description
Model Memorandum	Overview of the model's development, including the scientific and technical information utilized
Exhibit A: Scoring Examples	Examples of how scores are computed using the model
Exhibit B: Pearson’s Correlation Matrix	Statistical correlations used within the variables
Exhibit C: Sample Records	Sample data sets used in model
Exhibit D: Model Coefficients	Model coefficients and p-values
Exhibit E: Sample Scoring Calculations	Sample Scoring Calculations scoring examples for 10 anonymized risks
Exhibit F: Score Stability	Analysis showing scores stabilize as driving data accumulates

These materials contain proprietary methodologies, model architecture, and statistical outputs that are not publicly available and have been developed through significant investment in research and innovation. Telenav respectfully requests that the Wisconsin Office of the Commissioner of Insurance maintain the confidentiality of these documents based on the following:

- 1) The information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

The Model was developed through extensive modeling efforts using a very large data set. Telenav would suffer significant and irreparable economic harm if the details of the referenced materials were disclosed to any third party, particularly its competitors or insurance companies. Disclosure would allow such third parties to use or sell an identical or substantially similar product based on the enclosed proprietary information that will result in competitive harm to the company.

- 2) The information is the subject of efforts to maintain its secrecy that are reasonable under the circumstances.

Telenav has limited external documentation of information regarding the driver score to only those state departments of insurance in which the model has been filed. In each such state, the filing has been made on the condition that the model and supporting documentation be treated confidentially as proprietary and a trade secret of Telenav.

Disclosure of this information would cause competitive harm to the company, as it would allow competitors to bypass significant development time and costs. By accessing proprietary algorithms, formulas, and processes, competitors could implement similar solutions more quickly, undermining Telenav's market advantage and benefiting from work they did not invest in developing.

Telenav also requests that all correspondence pertaining to these documents are treated as confidential. Please reach out to me at the email address below if you have any questions about our confidential materials.

Sincerely,

DocuSigned by:

C895A46CBE1045D...

Loren Hillberg

Chief Administrative Officer

Telenav, Inc.

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(408) 245-3800

