



Republic of the Philippines
Department of Finance
INSURANCE COMMISSION
1071 United Nations Avenue
Manila



Legal Opinion (LO) No.:	2020 - 04
Date:	5 May 2020

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**SUBJECT: [Clarification] Applicability of Extension of
Non F2F Selling in Areas Under GCQ**

Dear Atty. Espineli:

This refers to your electronic mail ("e-mail") dated 2 May 2020 as regards the subject. In said e-mail, you sought clarification on "*whether the extension granted under IC Circular Letter No. 2020-46 up to June 30 for non-face to face selling will also apply to areas under GCQ*".

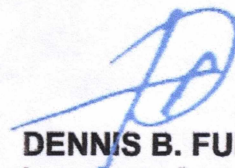
The imposition of General Community Quarantine ("GCQ") by lawful authorities is not contemplated under Circular Letter No. 2020-46 dated 22 April 2020. Said Circular Letter merely extends the effectivity of Circular Letter No. 2020-29 dated 30 March 2020 until any extension of the Enhanced Community Quarantine ("ECQ") Period or 30 June 2020, whichever comes later.

Accordingly, during said extended period and assuming that the ECQ will be lifted and be replaced by GCQ by lawful authorities, it shall be entirely within the discretion of concerned companies to adopt and implement its Initiatives under said Circular Letters in "*areas [that will be] under GCQ*". However, it must be emphasized that the adoption and implementation of said Initiatives during said extended period and in said areas under GCQ must not be contrary to any law, circular letter/s of this Commission, and/or existing rules and regulations, which includes the GCQ guidelines to be adopted and implemented by lawful authorities. Otherwise, said companies will be ordered to recall said Initiatives without prejudice to the imposition of any and all administrative sanctions per Section 3 of Circular Letter No. 2020-29 dated 30 March 2020.

Please note that the above opinion rendered by this Commission is based solely on the particular facts disclosed in the query and relevant solely to the particular issue raised therein and shall not be used, in any manner, in the nature of a standing rule binding upon the Commission in other cases whether for similar or dissimilar circumstances.

Please be guided accordingly.

Very truly yours,



DENNIS B. FUNA
Insurance Commissioner

