

SENT VIA EMAIL AND U.S. MAIL

July 22, 2010

Mr. James T. Odiorne
Deputy Insurance Commissioner
Company Supervision Division
Office of Insurance Commissioner
State of Washington
P. O. Box 40255
Olympia, WA 98504-0255

Dear Deputy Commissioner Odiorne:

We appreciate the willingness of the Office of the Insurance Commissioner to continue to consider our proposed changes to the possible amendment to Chapter RCW 48.13, the Insurer Investments Act. Below we suggest an additional technical correction, which we believe will clarify the legislation and provide greater certainty in its application. The comments in this letter are offered on behalf of Premera Blue Cross as well as its subsidiaries LifeWise Health Plan of Washington and LifeWise Assurance Company.

Proposed Change (redlined from OIC Version 2.0)

Section 7, Authorized Classes of Investments

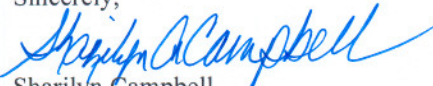
Sec. 7 AUTHORIZED CLASSES OF INVESTMENTS. The following classes of investments may be counted for the purposes specified in Section 11, whether they are made directly or as a participant in a partnership, joint venture or limited liability company (investments in partnerships, joint ventures and limited liability companies may be counted for the purposes specified in Section 11 only to the extent they are ~~are authorized investments only pursuant to within the limits of~~ Ssection- 7(12) of this aAct).

Reason for Requested Change:

We believe the modification suggested above is a clearer statement of the intent of the parenthetical, which is that investments in partnerships, joint ventures and limited liability companies can be counted toward an insurer's minimum assets requirement only to the extent such investment amounts fit within the "basket clause" limits of Section 7(12).

Once again, thank you for the opportunity to participate in the discussions and preliminary feedback. We respectfully urge you to incorporate this proposed revision into your next draft. If you have questions, please feel free to contact me.

Sincerely,


Sharilyn Campbell
Vice President, Finance