

VIA EMAIL

August 6, 2021

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RE: Insurance Commissioner Matter R 2021-07 (CR-101)

We appreciate the opportunity to provide comments on this important issue. Root Insurance supports the direction of the Office of the Insurance Commissioner, and it is our point of view that its proposed ban on the use of credit history in insurance pricing and underwriting should be implemented into Washington law through the temporary rulemaking process (R 2021-07).

From day one, Root has been focused on bringing fairness to insurance. The company has always offered personalized rates based primarily on driving behavior and less on unfairly discriminatory demographic factors, including credit history. In 2020, Root launched its Drop the Score effort to advocate for the removal of credit scores from rating variables. Root's commitment to offer fair, personalized rates based primarily on safe driving--and less on unfairly discriminatory factors, like credit score--allows the company to better price drivers and simultaneously give customers more control over their car insurance experience from start to finish.

By banning the use of credit, Washington State has demonstrated great leadership and is bringing more fairness to its roads.

In light of the emergency rule prohibiting credit, Root has expedited our internal process in order to enter the Washington market. Our "credit-free" rate and rules filings are currently before the Office of the Insurance Commissioner for approval. When the Commissioner approves these filings, we are confident that more Washingtonians will more quickly benefit from the prohibition of credit in personal lines.

We thank you for the opportunity to submit these comments.