

**From:** [Paul Hofmann](#)  
**To:** [OIC Rules Coordinator](#)  
**Cc:** [Paul Hofmann](#)  
**Subject:** RE: Notice of rulemaking on Title agent county declarations (R 2021-10)  
**Date:** Tuesday, July 27, 2021 3:39:59 PM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.jpg](#)

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Ms. Walker,

In regard to R 2021-10 I would like to put the following comments into the record for consideration.

History: Many years ago, when I purchased my 1<sup>st</sup> title plant, prior to being given the license to do business in that county the OIC came out and physically inspected my title plant. This practice may have seemed onerous at the time, however, in retrospect it maintained the integrity of the plants and assured that the consumers in our state were protected. We all took great pride in the quality of our plant assets and the quality of the corresponding insurance product. As the years have gone on that practice lapsed and in the most recent history all you had to do is fill out the form and no one checked. Consequently, we have companies that are doing business in the state that do not fully comply with the law or the rules of the OIC. Title plants play a vital role in the protection of the consumer in the state of Washington, and I commend the OIC for making this change.

I would encourage the OIC to put some definitions around the word “proof.” What constitutes proof under this rule? What documents are you going to be looking for? Our lease? How are you going to ensure that the leasing company has back to patent functionality that is required by law? For those of us with physical plants are we going back to inspection?

I believe it is important that whatever methodology of “proof” that is used by the OIC it ensures that the company requesting license to do business in that county actually has “real access” to the records prior to the digital plants along with access to the current digital indexes and ALL of the documents back to patent. I for one would be happy to submit to inspection of both my physical plants and my leased plants because I actually have them as required by law.

Regards,

**Paul A Hofmann**

Owner / President

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