

Ms. Walker,

Thank you for the opportunity to provide comment in regard to R 2021-10. The Fidelity National Financial family of title insurance companies, including Chicago Title of Washington, Fidelity National Title of Washington, Ticor Title of Washington, and Servicelink, would like to submit the below comments and questions seeking clarification into the record for consideration:

1. Is the OIC's expectation that title agents would be required to provide ownership or lease information retroactively, submitting proof of interest in all counties in which the title agent currently does business? If so, it would be helpful to the industry for the OIC to clarify how this reporting will work initially and what will be the OIC's expectation with regard to timing and content of any retroactive filings.
2. No definition is provided within the proposed rule modification regarding "proof of ownership or leasing rights" of the tract indexes. It would be very helpful for the rule to define "proof" so that the industry has clear understanding of what serves as sufficient evidence of ownership or lease under the proposed rule. It is also important to consider that evidence of ownership or lease interest of a title plant will vary depending on the circumstances that gave rise to the ownership or lease interest. For example, some title plants will have been created solely by regular posting for a period of years. In this example, while the entity does own a complete set of tract indexes as required by statute, there's no one document evidencing "proof of ownership." Ownership may also occur through acquisition of a title insurance company, wherein the title indexes ownership or lease interest would transfer to the acquiring entity. Documentation for acquisitions that occurred many years or even decades ago may no longer be available.

Thank you for your time and consideration.

Lindsay

Lindsay C. Doucette

VP | State Underwriting Counsel
Fidelity National Title Group
701 Fifth Avenue, Suite 2700
Seattle, Washington 98104
Direct: (206) 370-3172

From: [Doucette, Lindsay](#)
To: [OIC Rules Coordinator](#)
Subject: RE: RE: Notice of rulemaking on Title agent county declarations (R 2021-10)
Date: Wednesday, August 11, 2021 3:19:07 PM

Ms. Walker:

As a follow-up to our initial comments, Fidelity National Financial would like to participate in any stakeholder call with the OIC that may be scheduled.

Thank you for your consideration,

Lindsay

Lindsay C. Doucette

VP | State Underwriting Counsel

Fidelity National Title Group

Seattle, Washington

Direct: (206) 370-3172

Email: Lindsay.Doucette@fnf.com

This e-mail and its attachments are intended only for the persons named above. Please do not forward this message to others without permission.