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**To:** [OIC Rules Coordinator](#)  
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**Subject:** RE: CR-101 (R 2021-20) Out-of-state title records storage  
**Date:** Tuesday, August 17, 2021 3:04:24 PM  
**Attachments:** [image001.png](#)

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## External Email

Comments re: CR-101 (R 2021-20) Out-of-state title records storage

The provision as currently stated is overly broad and burdensome. Many title insurance companies and agents operate in multiple states, the location of which may provide for less costly storage and retention of records. Further, with current day technological advances, much record storage may occur in digital form and be completely adequate for retention purposes. Agents may have historical records numbering in the thousands, the relocation of which would be cost prohibitive and not advance a necessary purpose. If the goal of the rule is that the records be adequate and easily accessible, it does not follow that requiring them to be located in Washington rather than to be accessible in Washington is necessary.



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