

**From:** [CAROLE MATHEWS](#)  
**To:** [OIC Rules Coordinator](#)  
**Subject:** Temporary Prohibition of Use of Credit History R2021-07 Public Hearing  
**Date:** Monday, November 22, 2021 11:26:10 AM

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External Email

Hello,

I would like to submit the following comments for the above referenced public hearing. If this is not the appropriate means to submit comments, please advise.

The use of credit scores as one of the many factors in determining property and automobile insurance premiums is not unfair, it is based on sound actuarial data. If the data supports that policyholders with high credit scores are less likely to submit a claim then the rate should be lower for those policyholders. For example, a policyholder with a low credit score might not have the funds or the ability to obtain a loan to replace an aging roof. If the roof is damaged by a windstorm the insurance company is going to replace the roof, because it is very difficult to determine if the damage was caused by lack of maintenance or the wind. On the other hand, a policyholder with a high credit score most likely has the funds to maintain their property and will not sustain damage.

The Insurance Commissioners website states "Credit scoring discriminates". I guess that is true, but many factors in determining rates discriminate. Young drivers pay more for automobile insurance than older experienced drivers and people who live far away from a fire department are going pay more for homeowner insurance. This is based on data supporting young drivers have more accidents and the longer it takes for the fire department to reach a fire the more damage a structure will sustain. The use of credit scores is only one of many factors in determining insurance premiums and it is difficult to understand how this one factor, or any of the factors, can be considered to be based on race.

The Insurance Commissioner's emergency rule banning the use of credit scores was in effect when my homeowner and automobile policies renewed. I have an excellent credit score and as a result the homeowner policy increased 30% and the automobile policy increased 13%. Now, that is unfair.

It appears the main concern is, or should be, that people (regardless of race) are not financially prepared for events out of their control, which is not an insurance issue. Maybe the state's time and money would be better spent assisting people with high scores in financial planning.

Thank you for your time.

Carole Mathews

Concerned Policyholder  
Olympia, WA