

From: [Skyler Mahjoubian](#)
To: [Walker, Michael \(OIC\)](#)
Subject: CR-101 for R 2022-01 Transparency in Insurance Underwriting
Date: Thursday, April 21, 2022 12:31:45 PM

External Email

Dear Mr. Walker,

Premera Blue Cross and LifeWise Health Plan of Washington (“Premera”), thanks you for the opportunity to comment on the CR-101 for R 2022-01 Transparency in Insurance Underwriting. We appreciate the OIC’s thoughtful questions and considerations for stakeholders at today’s meeting and, in response, we respectfully request that “health carriers,” as defined in RCW 48.43.005(28) be excluded from the scope of this rulemaking. Health carriers are already subject to state and federal rating standards, which provide transparency to consumers and help them make informed decisions about their policies. As such, we believe that health carriers are distinct from other types of insurers in that we already provide the specific, detailed, information and appropriate notices contemplated by this rulemaking. We have concerns that further regulation may result in confusion, conflicting information, and inconsistent application across the industry. We look forward to reviewing proposed rule language and continued stakeholder engagement. Please feel free to contact me if you have any questions or would like to discuss further. Thank you.

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