

**From:** [Intisar Surur](#)  
**To:** [Walker, Michael \(OIC\)](#)  
**Cc:** [Tom McBride](#)  
**Subject:** Transparency rule recommendation  
**Date:** Thursday, July 21, 2022 1:14:18 PM

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External Email

Michael,

It was nice speaking with you today. I wanted to follow up via email and thank you for your engagement regarding the transparency in premium changes rulemaking. We appreciate you clarifying that Surplus Line insurers are not included as part of this rule.

To make this determination clear within the rule, we would recommend the following technical changes (in yellow) to the definition of "insurer" under WAC 284-30A-030:

3) "Insurer" means any individual, corporation, association, partnership, reciprocal exchange, interinsurer, fraternal mutual insurer, fraternal mutual life insurer, and any other legal entity engaged in the business of insurance, **and which is** authorized, or licensed to issue **and** which issues any insurance policy or insurance contract in this state. "Insurer" does not include health care service contractors, as defined in RCW 48.44.010, and health maintenance organizations, as defined in RCW 48.46.020.

We believe that these minor technical changes will go a long way to ensuring clarity of the rule's application. If you have any questions or want to discuss any of these proposed changes, please do not hesitate to reach out.

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