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Commissioner Kreidler
Office of the Insurance Commissioner
P.O. Box 40255
Olympia, WA 98504-0255

RE: Third Prepublication Draft R 2022-01 – Premium Change
Transparency

Commissioner Kreidler:

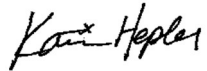
Thank you for the opportunity for Insurance Services Office, Inc. (ISO) to provide comments on the Third Prepublication Draft R 2022-01 – Premium Change Transparency being considered by the Washington Office of the Insurance Commissioner (OIC).

For you to best understand our perspective, please note that ISO provides information, including statistics, underwriting and claims information, actuarial analyses, policy language, and consulting and technical services in connection with multiple lines of property/casualty insurance, as well as information about specific properties. Our customers include insurers and reinsurers, as well as agents, brokers, self-insureds, risk managers, financial services firms, regulators, and various government agencies.

We appreciate the OIC's efforts to give guidance on premium change transparency; however, we believe clarity is needed with regards to the applicability of certain provisions. Specifically, WAC 284-30A-020(2) references "Private passenger automobile coverage", "Homeowner's coverage, including . . ." and "Dwelling property coverage." To enhance clarity, we suggest that you consider defining these types of insurance more explicitly. For instance, other laws may contain definitions of these types of insurance and if the intent is to track with existing definitions in this regard, you may consider incorporating those existing definitions by reference. If not, definitions could be added to enhance clarity.

We respectfully ask the OIC to consider the items we have noted and provide further clarity in the rule. Please feel free to contact me should you require additional information concerning ISO's position relative to these matters.

Sincerely,

A handwritten signature in black ink that reads "Katie Hepler". The signature is written in a cursive style with a small star above the 'i' in "Katie".

Katie Hepler