

From: [Waltraut Lehmann](#)
To: [Stoner, Bianca \(OIC\)](#); [OIC Rules Coordinator](#)
Subject: Rule proposal R 2016-06 Rating requirements
Date: Wednesday, September 14, 2016 1:06:07 PM

Dear Bianca,

On behalf of Premera Blue Cross, LifeWise Health Plan of Washington, and specifically LifeWise Assurance Company, thank you for the opportunities you have provided for us to review and discuss the rating requirements for large-group disability plans, standalone dental plans, and standalone vision plans. LifeWise Assurance has a large-group disability plan in force that is affected by the changes. We appreciate the work done to move rule sections to ensure clarity for both disability insurers and health care service contractors. The purpose of this message is to confirm that we have reviewed the rule proposal and believe it meets its purpose; we have no suggested changes. We would like to suggest that your office look for opportunities for additional rule clean-up – discussed at the stakeholder meeting but beyond the scope of the proposed rule – as more filings are made under the new requirements, which we believe will help identify areas to be addressed in future.

Premera/ LifeWise will not attend the rule hearing tomorrow. But, as always, if you have questions, please feel free to contact me. Thank you, and best regards,

Waltraut

*Waltraut B. Lehmann
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