

From: [Waltraut Lehmann](#)
To: [Stoner, Bianca \(OIC\)](#)
Subject: PBM rulemaking R 2016-07
Date: Friday, June 17, 2016 9:17:18 AM

Hello Bianca,

It was good to see you earlier this week, and as always, I appreciate the opportunities for stakeholder discussions on rulemaking efforts. I am writing you today regarding the OIC's CR-101 for rules to implement recent legislation that transfers oversight over pharmacy benefit managers to your office.

As you know, we (meaning Premera Blue Cross, LifeWise Health Plan of Washington, and LifeWise Assurance Company) work with a pharmacy benefit manager to provide the prescription drug benefits to the members covered on our health plans. We believe that rulemaking that affects PBMs will in all likelihood also have implications for the relationship between a PBM and the issuer. We are therefore not only planning to follow the rulemaking in this context, but would suggest that a stakeholder discussion on the details to be covered in the rules would be useful to ensure that the planned rules address what is needed, and on the other hand do not result in unintended consequences for any of the affected parties.

Please keep me on the list for any further communications on this subject. I look forward to working with you. Best regards,

Waltraut

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