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STATE OF WASHINGTON  
OFFICE OF THE INSURANCE COMMISSIONER

In Re:

ASSOCIATION OF WASHINGTON  
BUSINESS, et al.,

Respondents.

OIC No. 15-0019

**WITHDRAWAL OF DEMAND FOR  
HEARING AND AUTOMATIC STAY BY  
ASSOCIATION OF WASHINGTON  
BUSINESS AND AWB HEALTHCHOICE  
EMPLOYEE BENEFITS TRUST**

The Association of Washington Business and AWB HealthChoice Employee Benefits Trust (collectively, "Respondents") are pleased to learn that Commissioner Myron "Mike" Kreidler and the Washington Office of Insurance Commissioner ("Commissioner") admit that there is no basis for either threatening to disapprove or actually disapproving Respondents' Premera Blue Cross' ("PBC") large group association health plan filings. Respondents are equally gratified that the Commissioner states that the disapproval of these filings is a "mere possibility", there "simply is no credible basis" to support any such allegation, it would be "entirely speculation", and "entirely speculative and hypothetical" to suggest otherwise. See Commissioner's Motion to Dismiss for Lack of Threatened Agency Action and Lack of Standing ("Motion to Dismiss") at 1, 5, 6, and 7. The Commissioner has made these admissions despite having been placed on notice by Respondents that PBC's

1 filings in question include, for example, rating and benefits selection features that the  
2 Commissioner has recently disapproved in filings for other association health plans.

3 Respondents strongly disagree with most of the other assertions made by the  
4 Commissioner in the Motion to Dismiss. However, in view of the Commissioner's foregoing  
5 admissions, Respondents hereby immediately withdraw their demand for an administrative  
6 hearing and automatic stay. In doing so, Respondents reserve all rights against the  
7 Commissioner.

8 DATED this 5th day of March 2015.

9 BRACEWELL & GIULIANI LLP

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**CERTIFICATE OF SERVICE**

I hereby certify that I am an assistant to Curt Roy Hineline at Bracewell & Giuliani LLP and that a true and correct copy of the above and foregoing document has been served on the following, via E-Mail and U.S. Mail, on the 5th day of March, 2015.

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