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July 24, 2015

VIA U.S. Mail and E-Mail to KellyC@oic.wa.gov

Hon. George Finkle (Ret.)  
OIC Presiding Officer  
Hearings Unit, Office of Insurance Commissioner  
P.O. Box 40255  
Olympia, WA 98504-0255

Re: Officer of the Insurance Commissioner's Request for Stay -  
Washington State Farm Bureau Health Care Trust, Case No. 15-0111  
and Cambia Health Solutions, Case No. 15-0114

Dear Judge Finkle:

The Washington State Farm Bureau Health Care Trust ("Trust") submits this letter in response to the OIC's request for a sixty day stay of the briefing schedule for the above-captioned cases.

The Trust has requested a hearing on the same issues that were addressed in your July 1, 2015 Orders concerning the Washington Counties Insurance Fund, the Building Industry Association of Washington Health Insurance Trust, the MBA Trust, and the NMTA Trust. Specifically, the Trust has requested review of the OIC's disapproval of the Trust's underwriting methodology and setting rates at the participating employer level. There is no issue with the Trust's bona fide status. Your July 1, 2015 Orders have resolved these issues in the Trust's favor and there is no reason for additional delay in this matter.

That being said, the Trust has no objection to postponing the briefing schedule for a reasonable period of time to avoid unnecessary and duplicative briefing. However, if the OIC's request for a stay is granted, the Trust requests that you issue a show cause order directing the OIC to demonstrate in short order the need for further briefing on these matters. If such cause is not shown, the Trust requests that these matters be decided on the same basis set forth in the

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Washington Counties Insurance Fund, the Building Industry Association of Washington Health Insurance Trust, the MBA Trust, and the NMTA Trust.

Please feel free to contact me if you have any questions or concerns regarding this letter.

Very truly yours,

McKENZIE ROTHWELL BARLOW & COUGHRAN, P.S.



Frank J. Morales

cc: Board of Trustees, WEBHT  
AnnaLisa Gellerman, OIC  
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