



April 18, 2016

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

*sent via email to:
rulescoordinator@oic.wa.gov*

RE: Requiring notice to third party claimants of payments greater than \$5,000 (R 2015-06)

Dear Commissioner Kreidler:

Grange Insurance Association opposes this proposed regulation. The July 28, 2015 letter from NAMIC provides great detail on reasons why we are in opposition. Rather than repeating what was conveyed then, we'll just confirm that those reasons are still valid.

In addition to those reasons, there's a pragmatic concern we'd like to note. Oftentimes third party claimants are represented by an attorney. All dealings on the case are through the attorney and we may not know the address of the claimant. Further, bodily injury claims sometimes take years before final settlement. The claimant may have moved one or more times since we were contacted about attorney representation. Attempting to locate a current mailing address for the claimant presents an unwieldy administrative burden.

We trust all of the concerns expressed in the referenced NAMIC and our letters will lead the commissioner to drop the plans to proceed with implementing this rule.

Respectfully,

A handwritten signature in black ink that reads "Ryan M. Dudley". The signature is written in a cursive, flowing style.

Ryan M. Dudley
President & CEO, Grange Insurance Association