

From: Susan Marks
To: OIC Rules Coordinator
Subject: My Comments for second stakeholder draft for the temporary prohibition of use of credit history rulemaking, R 2021-07
Date: Monday, September 13, 2021 6:25:00 PM

External Email

Attention Insurance Commissioner Kreidler:

I am responding to the Temporary prohibition of use of credit history second stakeholder draft.

We are retired seniors on fixed incomes with insurance policies for both homeowners and automobiles policies. We have outstanding credit (838). We have no claims for either our homeowners or automobile policies. We have been fully insured for almost 25-30 years. We have high deductibles (\$1,000). We drive less than 3,000 miles for all vehicles which are rated for pleasure use. We abide by all the insurance rules, drive safe and keep up our home and auto maintenance up to date. Our insurance policies previously have gone up moderately each year and we've always paid on time and never late.

Now you have enacted this credit history rating ban in regulating insurance premiums. Our reward? Our premium is estimated to go up ~\$500 EACH (or more) for our auto and homeowner's policies. Over \$1,000 a year increase in premiums because of a poorly implemented policy by your office. This is a SIGNIFICANT expense for us. Through no fault of our own.

Jesse Jones of KIRO 7 interviewed you (insurance commissioner), and frankly, your answer is not reality of what is happening to good customers. You advised Jesse that customers should "shop around". Let me be clear. Renewal premiums are astronomical. I have personally quoted TEN different insurance companies to compare rates - same coverage as we have now. All companies have increased their rates because of your new policy. The only solution we have at renewal to save money would be to reduce our coverage amounts. Not a good option.

I'm angry and upset. It appears that insurance companies are significantly increasing the premiums to make up the difference in premium dollars they are losing to cover sub-credit insureds per your new policy. So, "good credit" insureds get to pay for the difference. This is not fair. Especially for seniors on a fixed income. Why should good customers have to make up the difference to fund the insurance companies? The policy you have put in place needs to be modified immediately.

I recommend:

1. The current policy should be paused immediately while additional research is done. Why should customers be penalized while your office and the insurance companies are fighting back and forth?
2. A new rule needs to be in place that existing customers' premiums (with good credit ratings, no losses, etc.) - should NOT increase more than 10% a year.
3. Insurance Companies should be audited by your office of how they are impacting customers with good credit ratings. For example - what percentage did premiums increase for these "good credit" customers? And what percentage of the increase was specifically caused by this new policy? The audit results should be published on the insurance commissioner's website.

I am not a person that generally complains about policies. I understand things are expensive and climate change is beginning to impact premiums. But the current policy about prohibition of use of credit history is impacting Washington insureds - and it is discriminating against seniors.

Thank you for the opportunity to provide comments. I look forward to hearing from you.

Regards, Susan Marks
206-380-2451

From: WA OIC <insurance.wa@public.govdelivery.com>
Reply-To: "insurance.wa@public.govdelivery.com" <insurance.wa@public.govdelivery.com>
Date: Tuesday, September 7, 2021 at 10:54 AM
To: S Marks <mgbssusan@hotmail.com>
Subject: Temporary prohibition of use of credit history second stakeholder draft posted

Office of the Insurance Commissioner



Temporary prohibition of use of credit history second stakeholder draft posted

Thanks for your interest in the temporary prohibition of use of credit history rulemaking from the Washington State Office of the Insurance Commissioner.

We released a second stakeholder draft for the temporary prohibition of use of credit history rulemaking, R 2021-07. These rules will temporarily prohibit the use of credit history to determine premiums and eligibility for coverage in private auto, homeowner and renter's insurance for three years after the public emergency concludes.

Comments on the stakeholder draft are due Sept. 17, 2021; please send them to rulescoordinator@oic.wa.gov.

For more information, including the text of the stakeholder draft, please [visit the rule's webpage](#).

If you've received this message, you do not need to sign up for any other notice to receive updates on this rule.



Questions? [Contact us](#)



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