



August 8, 2025

Via Electronic Mail (rulescoordinator@oic.wa.gov)

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

Re: ***Rules Comment – Proposed Changes to Wash. Admin. Code 284-30-300 through 284-30-400***

To Whom it May Concern:

CCC Intelligent Solutions, Inc. (“CCC”) respectfully submits the following comments concerning the proposed changes to Wash. Admin. Code 284-30-300 through 284-30-400 relating to the claims handling minimum standards rule (the “Proposed Rule”). CCC is the nation’s leading supplier of advanced software and communications systems for the automotive claims industry. CCC offers an array of products, including CCC ONE Valuation, which provides market values for vehicles stolen, destroyed, or damaged beyond repair, as well as CCC ONE Total Repair, which provides estimates for vehicles needing repairs. Both platforms have been in use for over 30 years. At this time, CCC has limited its comments to matters directly concerning CCC’s processes and regarding which CCC seeks clarity.¹

PROPOSED RULE – TOTAL LOSS

The Proposed Rule adds a requirement to WAC 248-30-392 that “[w]hen the insurer uses a computerized source for determining statistically valid actual cash values... [t]he insurer must provide supporting information to demonstrate the comparable motor vehicle’s condition.” CCC is uncertain regarding the intended objectives of this portion of the Proposed Rule or the specific needs it seeks to address. CCC has significant concerns regarding the Proposed Rule in its current form and believes implementing it as drafted could result in considerable challenges, as well as increased claim time and costs.

Specifically, the Proposed Rule appears to require an insurer relying on a computerized source to assist in determining actual cash value to document the condition of each comparable vehicle used in the valuation. While the Proposed Rule does not specify what forms of documentation would be acceptable, it is infeasible for the insurer, or any third party, to inspect and document the condition of every comparable vehicle that could potentially be included in such valuations. For perspective, CCC currently maintains approximately 8 million unique vehicles in

¹ The Proposed Rule contains other revisions about which CCC takes no position in this comment. CCC’s silence on any portion of the Proposed Rule should not be interpreted as either approval or disapproval. CCC reserves the right to comment on any portion of the Proposed Rule in the future should amendments or revisions warrant comment by CCC.



its databases, including about 202,000 unique vehicles within Washington State. Over 20 million unique vehicles pass through CCC's database annually, with approximately 490,000 in Washington State alone. CCC processed approximately 120,000 valuations in Washington in 2024, which collectively included 510,000 comparable vehicles. Given these volumes, physically inspecting all comparable vehicles to assess and document their condition is at least impractical, if not functionally impossible. Moreover, inspecting vehicles offered for sale by private owners would present significant logistical and privacy concerns. Requiring inspection of every comparable vehicle used in valuations would inevitably cause significant delays in resolving claims as well as increased expense.

Other methods for documenting vehicle condition would also be insufficient. Relying on dealerships or owners for assessments of a vehicle's condition would introduce bias and would require a significant time commitment to contact each source regarding each vehicle. Online advertisements with photos are often removed after sale, making them unavailable for later review, and it would be impractical and expensive to store every advertisement with pictures over a multi-year period. Even if such storage were possible, the photos may not show every aspect of a vehicle's condition, potentially limiting the pool of comparable vehicles available. This reduction in available data would likely result in additional requests for dealer quotes. Many dealers in Washington do not wish to field frequent phone calls asking for quotes, as there is little upside to the dealer in becoming involved in disputes between insurance companies and claimants.² Therefore, many dealers simply decline to provide quotes.

Finally, the Proposed Rule may result in inconsistent standards as it is currently drafted. Advertised comparables under WAC 284-30-391(2)(b)(i) may be used to determine actual cash value without verifying their condition; however, those same advertisements would not be allowed to be used by a computerized database like CCC unless the condition of the comparable vehicles is verified. This reflects a difference in application without a clear underlying purpose for the distinction.

For at least the reasons outlined herein, the Proposed Rule in its current form would significantly impede the efficient operation of most computerized sources used for determining actual cash value. Additionally, it would place a strain on resources, extend claims processing times, and increase costs.

PROPOSED RULE – PARTIAL LOSSES

Certain sections related to partial losses may benefit from clarification before proceeding with further comment and discussions.

Proposed Rule WAC 284-30-380(8) states “[i]f an insurer uses a database or survey to account for either material pricing, or labor rate, or both, and upon request of the claimant, the insurer must provide the claimant with the date the data was collected, where the data was collected

² CCC is aware of dealership personnel who have been verbally harassed and physically threatened over quotes they have provided for total loss valuations.



from, which businesses provided the data, and whether the business will honor the price provided if the insured were to consider using them.” Similarly, Proposed Rule WAC 284-30-390(1)(b)(i)(A) would require an insurer to “provide in writing how the labor and material costs and repair processes were determined and cite relevant policy language” if requested by a claimant.

These sections of the Proposed Rule lack clarity and do not fully reflect the complexities of materials pricing within third-party databases.³ CCC supplies two different types of material pricing to its customers: (1) repairable materials, which are consumable items used in the process of restoring a vehicle’s structure, body panels, or components to their pre-damaged condition, such as welding wire, seam sealers, adhesives and (2) refinish materials, which are consumable items used in the preparation and refinishing of a vehicle’s surface, such as basecoat, clearcoat, hardeners, reducers, blending agents, rags. Information about these materials can come from multiple sources over different time periods. This variability makes it difficult to pinpoint a single date or source for pricing data, especially when updates are delivered dynamically and may vary by region or supplier. Moreover, because this information can come from a variety of sources, CCC would not be able to confirm whether any particular business or supplier would be able to honor the price of, for example, a specific adhesive on a specific day. Finally, some of this information may emanate from the licensed data of third parties that CCC may not be contractually permitted to disclose.

CCC also supplies parts pricing data, although it is not clear whether the Proposed Rule is intended to encompass such data. CCC would be able to provide insurers with sources for parts pricing but would not be able to guarantee the availability of specific parts or whether quoted prices will be upheld. Parts prices reflect a particular point in time, and both availability and pricing may change between when the data is collected, when an estimate is prepared, and when a shop seeks to purchase a part. Additionally, suppliers provide data at varied intervals, which affects consistency in pricing.

At minimum, CCC believes the Proposed Rule needs additional clarification to reflect the realities of parts and material pricing.

CONCLUSION

CCC appreciates the opportunity to comment on the Proposed Rule and looks forward to continued discussion regarding this matter. Please do not hesitate to contact me if you would like any additional information or to discuss anything further.

Sincerely,

/s/Kathleen P. Lally
Associate General Counsel

³ CCC does not provide or engage in labor rate studies and therefore limits its comments to the portions of the Proposed Rule discussing material pricing.