

OIC Rules Coordinator

From: Chance Yager <Chance@emberlaw.com>
Sent: Friday, August 8, 2025 10:58 AM
To: OIC Rules Coordinator
Subject: R2025-05 First Prepublication draft comment

External Email

Hello,

The proposed changes to WAC 284-30-300 through 400 are useful ones that will help protect consumers. Insurance is a vital service, but all too often insurance companies act like they are not required to actually provide their customers with any benefits. These changes, should they go through, will help prevent insurers from taking advantage of their customers.

These changes are transparently good and; you do not have to be a lawyer to understand the benefit of requiring that insurance companies fully explain the reasons for their coverage decisions, or preventing insurers from mandating less-accurate photo-based “inspections” of damaged vehicles rather than actual physical inspections. I want to particularly call out the changes that would allow insureds and their repair facilities to send necessary information to insurers without having to use specific apps or systems. Not every person has a computer or smartphone, or reliable internet access, and this change is hugely beneficial to such people. Even as people use the internet and computers for more and more things, it is important that the law still provide for people who are left out of this technological advancement.

Another important change that should be given the spotlight is the changes to how insurers must handle emergency repairs. The current rules, which give more leeway for insurers to delay immediately necessary repairs or mitigation, can lead to inflicting further damage on already damaged properties, as leaking water is left to stagnate and so on. Requiring quick turnarounds in these kinds of situations is a good idea that will reduce damage and put property owners on the path to full repair quicker.

Chance B. Yager, Associate Attorney (he/him)
Ember Law PLLC
1700 Seventh Avenue, Suite 2100
Seattle, WA 98101
P. (206) 468-9410

