

## OIC Rules Coordinator

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**From:** Craig Trummel <CTrummel@wfgtitle.com>  
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### External Email

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The proposed changes raise concern to WFG as a title insurer. The proposed changes appear to be greatly influenced by Casualty Insurer claims and not title claims.

WAC 284-30-330 proposed changes prohibits the use of a database as part of an determinative decision in a claim investigation. A title claim involving an alleged missed encumbrance in the record, could be determined solely by review of the recorded documents affecting the insured property. The public record is often considered a database.

WAC 284-30-340 – The new section 2 of the rule would likely be abused by certain Insureds to harass the title insurer claims department with requests to produce, like Public Records Requests can be abusive. More carve outs or limitations are needed to limit abuse. The OIC has the power to request files, why expand?

WAC 284-30-360 – With the threat of penalties and enforcement in the preamble, the time limits should not be reduced. The Insurance Industry has no control of how and when claims are communicated. A rush of claims can occur at any time.

WAC 284-30-370 and WAC 284-30-380 - The increase from 15 days to 30 days is welcome, but with the clear intent to provide a penalty and enforcement for violating the 30 day limits on the specified communications, it is unreasonable for the typical life of a title claim, where litigation and negotiation are common with longer lived complex title claims. WFG requests the title industry be exempt from the timelines of this rule.

WFG requests the OIC entertain a meeting with just title insurers to address specific consumer protections the OIC believes are needed for consumers filing title claims.

Regards,  
Craig Trummel



WFG National Title Insurance Company  
a Williston Financial Group company



**Craig Trummel**

Regional Underwriter/Washington State Counsel

C: 206.580.8344 | [ctrummel@wfgtitle.com](mailto:ctrummel@wfgtitle.com) | [www.wfgtitle.com](http://www.wfgtitle.com)

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