



August 8, 2025

VIA EMAIL

Rules Coordinator
Office of the Insurance Commissioner

RE: R 2025 Clarifying and updating the minimum standards for claims handling

Thank you for the opportunity to comment on the prepublication draft R 2025-5 for changes proposed to WAC 285-30. As always, we appreciate the opportunity to participate early in the rule making process. Audatex submits the following comments concerning WAC 284-30-392. As the draft is amended, Audatex may submit additional comments.

284-30-392 Methods or Standards of Practice for Settlement of Total Loss Vehicle Claims, Section (4)(d).

Each year, tens of thousands of total loss claims are submitted to insurers in Washington, many of whom rely on valuation companies such as Audatex to provide total loss valuations that span a broad range of vehicles. In order to prepare these valuations, Audatex aggregates hundreds of thousands of vehicle listings from across the state.

Given the scale and frequency of total loss claims, it is not operationally feasible to individually validate the condition of every vehicle listed for sale in Washington, nor each comparable vehicle used in individual valuations. To our knowledge, no state currently mandates such a requirement.

Audatex relies on robust datasets to determine a representative average value for a specific year, make, and model. This average is reflective of a vehicle in typical condition. Because the vast majority of comparable vehicles included in valuations are sourced from licensed dealerships, it is reasonable and industry-standard to assume these vehicles are in average, or better, condition. This assumption allows for appropriate and accurate condition adjustments to be made to reflect the actual state of the loss vehicle as reported to



Audatex—whether above or below average—without requiring direct inspection of each comparable.

Given these considerations, we believe the goals of accuracy and fairness in total loss valuations can be fully achieved under the requirements currently prescribed under WAC **284-30-391 Methods and standards of practice for settlement of total loss vehicle claims** without the operationally impracticable requirement suggested in (4)(d). We respectfully recommend that this subparagraph be deleted.

We are happy to answer any questions or provide additional information that may assist the Office of the Insurance Commissioner as you to consider further updates to the regulations.

Kind regards,

Diane Zeni

Director Government and Regulatory Affairs
Solera Holdings, LLC