

Via email
August 8, 2025

Office of the Insurance Commissioner
Washington State

Re: Rule 2025-05 Clarifying and Updating the Minimum Standards for Claims Handling

Dear Rules Committee:

Thank you for the opportunity to provide these comments on the first prepublication draft for the claims handling minimum standards rule (R 2025-05).

Proposed Changes Section: WAC 284-30-392 Information that must be included in the insurer's total loss vehicle valuation report.

(d) The insurer must provide supporting information to demonstrate the comparable motor vehicle's condition.

Mitchell Comments: As defined under **WAC 284-30-391 (2) (b) (iv)**, a Computerized Source "must produce values for at least eighty-five percent of all makes and models for a minimum of fifteen years taking into account the values of all major options for such motor vehicles."

Mitchell seeks clarification that the supporting information to demonstrate a comparable vehicle's condition could be the characterization of the source-type of the comparable vehicles. For example, the supporting information to demonstrate the comparable motor vehicle's condition of a Dealer-Sourced Comparable Vehicle would be the categorization of it being Dealer-Sourced, thus its condition would be considered more favorable than a Private-Sourced Comparable Vehicle as it has undergone dealer reconditioning to get it ready to sale. We respectfully suggest that adding "or source categorization" prior to "to demonstrate" would clarify the requirement.

Again, thank you for providing us with the opportunity to provide these comments.

Sincerely,

Joe Riedesel

Joe Riedesel
Senior Director of Product Management
Auto Physical Damage Division