

## OIC Rules Coordinator

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**From:** Justin Lewis <justin@accurateab.com>  
**Sent:** Friday, August 8, 2025 4:51 PM  
**To:** OIC Rules Coordinator  
**Subject:** Public Comment in Support of Rule Revisions to WAC 284-30 (R 2025-05)  
**Attachments:** insurance initial estimate.pdf; RE\_ Rivian estimate - Pappas\_Scott - Justin Lewis - Outlook.pdf; shop initial estimate.pdf; WICRA Presentation 2023 July Repair Facility Survey presentation to the OIC.pdf

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### External Email

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Dear Commissioner and Rulemaking Team,

On behalf of Accurate Auto Body and the Washington Independent Collision Repairers Association (WICRA), I am writing in unequivocal support of the proposed rule revisions under R 2025-05. These changes are not just needed—they are a direct response to a systemic pattern of abusive behavior by insurers that has gone unchecked for far too long.

Across our state, consumers are being misled, manipulated, and financially harmed by insurers who routinely distort the claims process. This is not theoretical. This is happening every single day in shops like mine and in households across Washington. The current regulatory framework has allowed insurers to act with near impunity, pushing their own financial interests while forcing consumers into unsafe, uninformed decisions about their vehicles, their safety, and their rights.

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#### Consumers Are Being Set Up to Fail

Insurers are deliberately issuing repair estimates that they know are incomplete and insufficient to restore vehicles to safe, pre-loss condition. These estimates routinely exclude critical OEM procedures, required materials, and realistic labor times—all in an effort to present the illusion of a cheaper repair. But the consequence of that deception falls squarely on the consumer.

When these estimates are challenged, consumers are pressured with scare tactics:

- “That shop charges too much.”
- “We don’t guarantee their work.”
- “You’ll have to pay the difference out of pocket.”

These are not misunderstandings. They are intentional acts of coercion, designed to steer consumers into insurer-preferred shops that agree to cut costs—often at the expense of repair quality, vehicle integrity, and safety. Consumers are not told the truth. They are not shown their rights. They are set up to believe they must choose between financial ruin and substandard repairs.

This is not claims handling. This is claims manipulation. I have also attached the study that WICRA performed and submitted to the Insurance Commissioner’s office in 2023 that demonstrates unfair and deceptive practices, low balling and steering of consumers to insurance preferred network shops.

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## A Real Example of Consumer Harm

Attached is correspondence from a third party acting on behalf of an insurer. We initially wrote the repair estimate on August 1 and submitted it to the carrier. Our customer followed up with the insurer seeking contact on August 5. This morning, we received the attached email response, which essentially denies any additional compensation unless the vehicle is fully disassembled and on-site.

In other words, my customer must commit to a \$3,569.03 shortfall—out of their own pocket—just to find out if the insurer might eventually cover the full cost. This is how insurers steer / coheres claimants to the insurers contracted shops. Other states already recognize these problems and have specific language in their unfair claims practice rules to prevent insurers from steering and coercion of claimants to specific repair facilities.

This is a textbook example of what these proposed rules aim to prevent: forcing consumers to shoulder financial risk, uncertainty, and stress simply to access the benefits they paid for. It's unjustifiable, unethical, and far too common.

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## The Rules Don't Burden Honest Insurers—They Expose the Dishonest Ones

The proposed revisions to WAC 284-30-330 and WAC 284-30-390 directly address these tactics:

- Insurers will be required to justify their denials with actual policy language.
- They will be prohibited from denying legitimate estimates just because a shop refuses to cut corners.
- Consumers must be included in all communications—not left out of back-channel decisions.
- Insurers will no longer be allowed to force communication through proprietary platforms that isolate consumers and delay transparency.
- Insurers are required, if requested by a claimant, to come on site to review damages in person if disputes arise from remote/photo based claims handling.
- Most critically, they require competent persons to settle claims with added timelines that are currently being taken advantage of and many times not adhered to.

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## This Is About the Consumer. Period.

This is about consumers being manipulated into making bad decisions—because they're given bad information, denied the choice of taking their vehicles to a shop they know and trust, and pushed toward repair paths that compromise safety and quality.

Shops like mine are caught in the crossfire only because we refuse to take part in this deception. Our commitment to proper repairs and consumer advocacy puts us at odds with insurers that prioritize cost over correctness. We are standing up because our customers deserve better.

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## Conclusion

These rules are a long-overdue line in the sand. They will help level the playing field and force insurers to deal honestly—with consumers, with repairers, and with the policies they sold. I urge the Office of the Insurance

Commissioner to adopt the proposed revisions and add language that clearly states that the claimant has the right to choose a repair facility of their own choosing. Washington consumers deserve transparency, accountability, and protection—especially after a loss.

Sincerely,  
Justin Lewis  
President, WICRA  
Owner, Accurate Auto Body  
Redmond, WA  
206-818-9862

# INTEGON NATIONAL INSURANCE COMPANY

ONTARIO CLAIMS OFFICE  
SUPPLEMENTS \*\* Refer to Disclaimer

Below for Instructions \*\*  
PO Box 1623  
WINSTON SALEM, NC 27102  
Phone: (800) 468-3466

Claim #: 250525951-1  
Workfile ID: 9eaf1b9d

## Estimate of Record

Written By: SEAN MCMASTER, 7/31/2025 2:12:34 PM  
Adjuster: AGUIRRE, BRUNO, (469) 680-0314 Business

Insured:	LOURDES VELAZQUEZ FARIAS	Owner Policy #:		Claim #:	250525951-1
Type of Loss:	Liability	Date of Loss:	06/27/2025 02:10 PM	Days to Repair:	3
Point of Impact:	06 Rear	Deductible:			

Owner (Claimant):	Inspection Location:	Appraiser Information:	Repair Facility:
ANDREW SCOTT 4604 SW AUSTIN ST SEATTLE, WA 98136 (678) 910-3521 Cellular ANDY.G.SCOTT@GMAIL.COM	SCOTT, ANDREW 4604 SW AUSTIN ST SEATTLE, WA 98136 Desk (678) 910-3521 Day	(425) 620-6584	

## VEHICLE

2023 RIVI R1S Adventure w/Quad Motor Large Pack 4D UTV Electric- Electric silver

VIN:	7PDSGABA2PN008994	Production Date:	01/2023	Interior Color:	Black
License:	wd08182	Odometer:	22767	Exterior Color:	silver
State:	WA	Condition:	Good		

TRANSMISSION	Intermittent Wipers	AM Radio	Skyview Roof
Automatic Transmission	Tilt Wheel	FM Radio	SEATS
4 Wheel Drive	Cruise Control	Stereo	Bucket Seats
POWER	Rear Defogger	Search/Seek	Reclining/Lounge Seats
Power Steering	Keyless Entry	Auxiliary Audio Connection	Leather Seats
Power Brakes	Alarm	SAFETY	Heated Seats
Power Windows	Steering Wheel Touch Controls	Drivers Side Air Bag	Ventilated Seats
Power Locks	Rear Window Wiper	Passenger Air Bag	3rd Row Seat
Power Mirrors	Telescopic Wheel	Anti-Lock Brakes (4)	WHEELS
Heated Mirrors	Heated Steering Wheel	4 Wheel Disc Brakes	20" Or Larger Wheels
Power Driver Seat	Climate Control	Traction Control	PAINT
Power Passenger Seat	Dual Air Condition	Stability Control	Clear Coat Paint
Memory Package	Navigation System	Front Side Impact Air Bags	OTHER
DECOR	Backup Camera	Head/Curtain Air Bags	Fog Lamps
Dual Mirrors	Parking Sensors	Hands Free Device	Signal Integrated Mirrors
Privacy Glass	Surround View Camera	Xenon or L.E.D. Headlamps	TRUCK
Console/Storage	Remote Starter	Blind Spot Detection	Trailer Hitch

### Estimate of Record

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2023 RIVI R1S Adventure w/Quad Motor Large Pack 4D UTV Electric- Electric silver

CONVENIENCE	Intelligent Cruise	Lane Departure Warning	Power Trunk/Liftgate
Air Conditioning	RADIO	ROOF	

## Estimate of Record

2023 RIVI R1S Adventure w/Quad Motor Large Pack 4D UTV Electric- Electric silver

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1		REAR BUMPER					
2		O/H bumper assy				3.2	
3	Repl	Bumper cover	PT00778201C	1	991.39	Incl.	
4	Repl	Applique	PT00003375H001	1	282.26	Incl.	1.8
5		Add for Clear Coat					0.4
6	*	Rpr Lower panel	PT00045170D			<u>1.0</u>	<u>0.8</u>
7	Repl	Access panel tow hitch	PT00032793G	1	135.95	Incl.	
8		VEHICLE DIAGNOSTICS					
9	#	Pre-Scan		1		0.5 M	
10	#	Post Scan		1		0.5 M	
11		MISCELLANEOUS OPERATIONS					
12	#	Subl Hazardous Waste		1	3.00		
SUBTOTALS					1,412.60	5.2	3.0

## NOTES

Prior Damage Notes:  
 upper rear gate lamp

## ESTIMATE TOTALS

Category	Basis	Rate	Cost \$
Parts			1,412.60
Body Labor	4.2 hrs @	\$ 65.00 /hr	273.00
Paint Labor	3.0 hrs @	\$ 65.00 /hr	195.00
Mechanical Labor	1.0 hrs @	\$ 125.00 /hr	125.00
Paint Supplies	3.0 hrs @	\$ 45.00 /hr	135.00
Subtotal			2,140.60
Sales Tax	\$ 2,140.60 @	10.3500 %	221.55
Total Cost of Repairs			2,362.15
Total Adjustments			0.00
Net Cost of Repairs			2,362.15

## Estimate of Record

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2023 RIVI R1S Adventure w/Quad Motor Large Pack 4D UTV Electric- Electric silver

NOTE TO VEHICLE OWNER - National General Insurance an Allstate company does business with collision repair shops in your area and has developed a preferred network of shops with proven, high standards. We recognize that you, the vehicle owner, have the right to select the repair facility of your choice and are under no obligation to use any of the shops on the list. We will pay the amount we determine payable under the policy regardless of the repair facility chosen. We will attempt to get an agreed cost of repairs with the shop of your choice. If this is not possible, we will extend a fair and reasonable offer to repair the loss related damage to your vehicle based on industry repair standards and prevailing market rates. If there are loss related damages that were not visible at the time of the initial estimate, or damages not included in the original estimate, the additional damage will be considered for a supplemental repair estimate.

\*\*\* THIS IS NOT AN AUTHORIZATION TO REPAIR. VEHICLE OWNER MUST GIVE PERMISSION FOR REPAIRS TO BEGIN. \*\*\*

### SUPPLEMENT PROCESS INSTRUCTIONS:

Please be aware that any additional damage must be inspected by a National General an Allstate Company representative while the vehicle is at the shop and torn down (when reasonably appropriate), prior to the repairs being completed. If National General an Allstate Company is not informed of supplemental damage, it may not be covered under the claim. In addition, all invoices will be requested and reviewed.

1. VIRTUAL ASSIST: Please follow the Virtual Assist App process for future supplement requests. The Virtual Assist App can be downloaded at no charge by visiting the Apple App store or the Google Play store. Search, download and install: National General / Encompass.

\*Available in all states except MA and RI\*

2. For repair shops using CCC One Estimating, supplement requests can be submitted using Estimate Share. The claim number and work file Id located at the top of this document will be needed to proceed. Instructions for using Estimate Share can be found at

[https://help.cccis.com/static/ccc\\_one/training/EstimateShare/RequestingEstimateShareStaffRF.pdf](https://help.cccis.com/static/ccc_one/training/EstimateShare/RequestingEstimateShareStaffRF.pdf)

\* Photos and supporting documents should accompany submitted supplemental estimate considerations.

3. For all other repair shops: Send your supplement request with supporting photos and documents to SUPP@NGIC.com.

IT IS A CRIME TO KNOWINGLY PROVIDE FALSE, INCOMPLETE, OR MISLEADING INFORMATION TO AN INSURANCE COMPANY FOR THE PURPOSE OF DEFRAUDING THE COMPANY. PENALTIES INCLUDE IMPRISONMENT, FINES, AND DENIAL OF INSURANCE BENEFITS.

## Estimate of Record

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2023 RIVI R1S Adventure w/Quad Motor Large Pack 4D UTV Electric- Electric silver

Estimate based on MOTOR CRASH ESTIMATING GUIDE and potentially other third party sources of data. Unless otherwise noted, (a) all items are derived from the Guide DR4EV02, CCC Data Date 07/17/2025, and potentially other third party sources of data; and (b) the parts presented are OEM-parts. OEM parts are manufactured by or for the vehicle's Original Equipment Manufacturer (OEM) according to OEM's specifications for U.S. distribution. OEM parts are available at OE/Vehicle dealerships or the specified supplier. OPT OEM (Optional OEM) or ALT OEM (Alternative OEM) parts are OEM parts that may be provided by or through alternate sources other than the OEM vehicle dealerships with discounted pricing. Asterisk (\*) or Double Asterisk (\*\*) indicates that the parts and/or labor data provided by third party sources of data may have been modified or may have come from an alternate data source. Tilde sign (~) items indicate MOTOR Not-Included Labor operations. The symbol (<>) indicates the refinish operation WILL NOT be performed as a separate procedure from the other panels in the estimate. Non-Original Equipment Manufacturer aftermarket parts are described as Non OEM, A/M or NAGS. Used parts are described as LKQ, RCY, or USED. Reconditioned parts are described as Recond. Recored parts are described as Recore. NAGS Part Numbers and Benchmark Prices are provided by National Auto Glass Specifications. Labor operation times listed on the line with the NAGS information are MOTOR suggested labor operation times. NAGS labor operation times are not included. Pound sign (#) items indicate manual entries.

Some 2024 vehicles contain minor changes from the previous year. For those vehicles, prior to receiving updated data from the vehicle manufacturer, labor and parts data from the previous year may be used. The CCC ONE estimator has a list of applicable vehicles. Parts numbers and prices should be confirmed with the local dealership.

The following is a list of additional abbreviations or symbols that may be used to describe work to be done or parts to be repaired or replaced:

### SYMBOLS FOLLOWING PART PRICE:

m=MOTOR Mechanical component. s=MOTOR Structural component. T=Miscellaneous Taxed charge category.  
X=Miscellaneous Non-Taxed charge category.

### SYMBOLS FOLLOWING LABOR:

D=Diagnostic labor category. E=Electrical labor category. F=Frame labor category. G=Glass labor category.  
M=Mechanical labor category. S=Structural labor category. (numbers) 1 through 4=User Defined Labor Categories.

### OTHER SYMBOLS AND ABBREVIATIONS:

Adj.=Adjacent. Algn.=Align. ALU=Aluminum. A/M=Aftermarket part. Blnd=Blend. BOR=Boron steel.  
CAPA=Certified Automotive Parts Association. CFC=Carbon Fiber.  
D&R=Disconnect and Reconnect. HSS=High Strength Steel. HYD=Hydroformed Steel. Incl.=Included. LKQ=Like Kind and Quality. LT=Left. MAG=Magnesium. Non-Adj.=Non Adjacent. NSF=NSF International Certified Part.  
O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace. R&I=Remove and Install. R&R=Remove and Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel. Sect=Section. STS=Stainless Steel. Subl=Sublet.  
UHS=Ultra High Strength Steel. N=Note(s) associated with the estimate line.

CCC ONE Estimating - A product of CCC Intelligent Solutions Inc.

The following is a list of abbreviations that may be used in CCC ONE Estimating that are not part of the MOTOR CRASH ESTIMATING GUIDE:

BAR=Bureau of Automotive Repair. EPA=Environmental Protection Agency. NHTSA= National Highway Transportation and Safety Administration. PDR=Paintless Dent Repair. VIN=Vehicle Identification Number.





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**RE: Rivian estimate - Pappas/Scott**

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**From** McMaster, Sean <Sean.McMaster@NGIC.COM>

**Date** Fri 8/8/2025 10:00 AM

**To** Justin Lewis <justin@accurateab.com>

Hey Justin, I spoke to reception and they said the car is not there and not scheduled so, unfortunately, I can address your supplement.

National general has a hard and fast rule (not sure where that colloquialism came from) that they will not recognize a supplement until its at the shop and a proper teardown has been completed.

If the vehicle makes it in the shop, send your supplement to [supp@ngic.com](mailto:supp@ngic.com) or use estimate share!

Thanks buddy, looks ike I nailed it in my previous email about time off! Good for you! I hope it was all fun and no problems!

Seeya

Sean

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**From:** Justin Lewis <justin@accurateab.com>

**Sent:** Friday, August 1, 2025 4:16 PM

**To:** Bethany Pappas <bethanypappas@gmail.com>

**Cc:** Claims Supplements <Supp@NGIC.COM>

**Subject:** RE: Rivian estimate - Pappas/Scott

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**This Message Is From an External Sender**

[Report Suspicious](#)

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Hello,

Attached is the repair plan for the Rivian damages. Please get back to us with any questions and an updated cost estimate so we can get this in process.

Thanks,

Justin Lewis | Accurate Auto Body

9042 Willows Road NE

Redmond, WA 98052

425-883-2450

Confidentiality Notice: This email message, including any attachments, is for the sole use of the intended recipients and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by e-mail and destroy all copies of the original message. Please consider the environment before printing this message.

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**From:** [repair@accurateab.com](mailto:repair@accurateab.com)  
**Sent:** Friday, August 1, 2025 11:53 AM  
**To:** Justin Lewis  
**Subject:** FW: Rivian estimate - Pappas/Scott  
**Importance:** High  
pappas

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**From:** Bethany Pappas <[bethanypappas@gmail.com](mailto:bethanypappas@gmail.com)>

**Sent:** Friday, August 1, 2025 11:40 AM

**To:** [repair@accurateab.com](mailto:repair@accurateab.com)

**Subject:** Re: Rivian estimate - Pappas/Scott

Just wanted to loop back on this request, and add the estimate from the insurance company. Attached.

Please let me know if you have any questions or need anything else from me. I'd like to get this repair booked as soon as possible.

Bethany

2062258751

On Mon, Jul 28, 2025 at 10:19 AM Bethany Pappas <[bethanypappas@gmail.com](mailto:bethanypappas@gmail.com)> wrote:

Hello-

We are in need of another estimate/appointment for our Rivian to be repaired. This time I was rear ended.

Thank you,

Bethany Pappas

2062258751

VIN: 7PDSGABA2PN008994

Photos attached

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Note: Please be aware that unencrypted electronic mail is not secure. For this reason, please do not send any sensitive personal information such as your address, driver license, policy number, Social Security Number, or claims information by unencrypted electronic mail. The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Thank you.



## ACCURATE AUTO BODY INC.

"We Meet by Accident"  
9042 WILLOWS ROAD N.E., REDMOND, WA 98052  
Phone: (425) 883-2450

Workfile ID: 1292eded  
Federal ID: 911660838

### Preliminary Estimate

**Customer: PAPPAS, BETHANY**

Written By: Justin Lewis

Insured: PAPPAS, BETHANY  
Type of Loss:  
Point of Impact:

Policy #:  
Date of Loss:

Claim #: 250525951-1  
Days to Repair: 0

**Owner:**  
PAPPAS, BETHANY  
(206) 225-8751 Cell

**Inspection Location:**  
ACCURATE AUTO BODY INC.  
9042 WILLOWS ROAD N.E.  
REDMOND, WA 98052  
Repair Facility  
(425) 883-2450 Business

**Insurance Company:**  
INTEGON CASUALTY INSURANCE COMPANY

### VEHICLE

2023 RIVI R1S Adventure w/Quad Motor Large Pack 4D UTV Electric- Electric LA SILVER

VIN: 7PDSGABA2PN008994	Interior Color:	Mileage In:	Vehicle Out:
License:	Exterior Color: LA SILVER	Mileage Out:	
State:	Production Date:	Condition:	Job #:

#### TRANSMISSION

Automatic Transmission  
4 Wheel Drive

#### POWER

Power Steering  
Power Brakes  
Power Windows  
Power Locks  
Power Mirrors  
Heated Mirrors  
Power Driver Seat  
Power Passenger Seat  
Memory Package

#### DECOR

Dual Mirrors  
Privacy Glass  
Console/Storage

#### CONVENIENCE

Air Conditioning

Intermittent Wipers  
Tilt Wheel  
Cruise Control  
Rear Defogger  
Keyless Entry  
Alarm  
Steering Wheel Touch Controls  
Rear Window Wiper  
Telescopic Wheel  
Heated Steering Wheel  
Climate Control  
Dual Air Condition  
Navigation System  
Backup Camera  
Parking Sensors  
Surround View Camera  
Remote Starter  
Intelligent Cruise

#### RADIO

AM Radio  
FM Radio  
Stereo  
Search/Seek  
Auxiliary Audio Connection

#### SAFETY

Drivers Side Air Bag  
Passenger Air Bag  
Anti-Lock Brakes (4)  
4 Wheel Disc Brakes  
Traction Control  
Stability Control  
Front Side Impact Air Bags  
Head/Curtain Air Bags  
Hands Free Device  
Xenon or L.E.D. Headlamps  
Blind Spot Detection  
Lane Departure Warning

#### ROOF

Skyview Roof

#### SEATS

Bucket Seats  
Reclining/Lounge Seats  
Leather Seats  
Heated Seats  
Ventilated Seats  
3rd Row Seat

#### WHEELS

20" Or Larger Wheels

#### PAINT

Clear Coat Paint

#### OTHER

Fog Lamps  
Signal Integrated Mirrors

#### TRUCK

Trailer Hitch  
Power Trunk/Liftgate

Get live updates at [www.carwise.com/e/58VL4a](http://www.carwise.com/e/58VL4a)

# Preliminary Estimate

**Customer: PAPPAS, BETHANY**

2023 RIVI R1S Adventure w/Quad Motor Large Pack 4D UTV Electric- Electric LA SILVER

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1		<b>QUARTER PANEL</b>					
2	R&I	RT Flare				0.5	
3	Repl	RT Flare clip	SC00006383A	7	11.20		
4	R&I	LT Flare				0.5	
5	Repl	LT Flare clip	SC00006383A	7	11.20		
6		<b>REAR BODY &amp; FLOOR</b>					
7	Repl	Under cover bolt	SC00013900A	5	13.35		
8		<b>LIFT GATE</b>					
9	R&I	Upper gate trim				0.2	
10		<b>TAIL GATE</b>					
11	*	Rpr Tail gate primed				<u>1.0</u>	2.0
12		Add for Clear Coat					0.8
13	Repl	RT Upper seal	PT00058242B	1	32.91	0.2	
14	Repl	LT Upper seal	PT00058241B	1	32.91	0.2	
15	Repl	RT Hinge bolt	SC00017821A	2	5.92		
16	Repl	LT Hinge bolt	SC00017821A	3	8.88		
17	R&I	Torsion rod				0.2	
18	R&I	Upper gate trim				0.2	
19	R&I	Lower gate trim				0.2	
20		<b>REAR LAMPS</b>					
21	Repl	Light bar	PT00000470U	1	1,061.95	0.3	
22		<b>REAR BUMPER</b>					
23		O/H bumper assy				3.2	
24	Repl	Bumper cover	PT00778201C	1	939.50	Incl.	
25	Repl	Bumper cover washer	SC00004348A	2	2.50		
26	*	Repl Applique	PT00003375H001	1	275.83	Incl.	<u>0.0</u>
27	Repl	Lower cover	PT00049049F	1	295.64	Incl.	
28	Repl	Access panel tow hitch	PT00032793G	1	135.94	Incl.	
29	*	Repl Park sensor	PT00509504C	1	136.21 m	Incl.	<u>0.0</u>
30		<b>MISCELLANEOUS OPERATIONS</b>					
31	#	Bag Vehicle FOR PAINT		1	5.00	0.3	
32	#	BAG VEHICLE FOR PRIMER		1	5.00	0.3	
33	#	Rpr Color Sand & Buff					0.6
34	#	Refn FEATHER PRIME AND BLOCK					0.5
35	#	Hazardous Waste Disposal		1	10.00		
36	#	Paint Materials		1			
37	#	Rpr STATIC REMOVAL .3 PER PANEL				0.3	
38	#	Tint Color		1			0.5
39	#	Subl PRE SCAN-SUBLET +25%		1	117.19		
40	#	Subl POST SCAN SUBLET +25%		1	117.19		
41	#	PRE WASH		1		0.5	
42	#	POST REPAIR CLEAN UP		1		1.0	
43	#	SOLID WASTE DISPOSAL		1	10.00		

## Preliminary Estimate

**Customer: PAPPAS, BETHANY**

2023 RIVI R1S Adventure w/Quad Motor Large Pack 4D UTV Electric- Electric LA SILVER

44	#	MAINTAIN HV BATTERY	1	0.5
45	#	PROCEDURE REPAIR	1	0.5
<b>SUBTOTALS</b>			<b>3,228.32</b>	<b>10.1</b>

**4.4**

### ESTIMATE TOTALS

Category	Basis			Rate	Cost \$
Parts					3,228.32
Body Labor	10.1 hrs	@	\$ 130.00 /hr		1,313.00
Paint Labor	4.4 hrs	@	\$ 130.00 /hr		572.00
Paint Supplies	4.4 hrs	@	\$ 60.00 /hr		264.00
Subtotal					5,377.32
Sales Tax	\$ 5,377.32	@	10.3000 %		553.86
<b>Grand Total</b>					<b>5,931.18</b>

THIS IS ONLY AN ESTIMATE. HIDDEN AND UNSEEN DAMAGES ARE NOT ACCOUNTED FOR IN THIS ESTIMATE. FURTHER ANALYSIS MAY ALTER THE COST OF REPAIRS AT THE OWNER'S EXPENSE. ALL PRICES ARE SUBJECT TO DEALER'S INVOICE.

IN REPAIRING YOUR VEHICLE, IT MAY BE NECESSARY TO DISCONNECT THE BATTERY. PRE-STORED RADIO STATIONS AND CODES WILL THEN NEED TO BE RESET. PLEASE LOCATE AND PROVIDE YOUR RADIO CODE AT TIME OF REPAIRS SO THAT WE MAY RESET IT FOR YOU. YOU WILL BE RESPONSIBLE FOR RESETTING YOUR RADIO STATIONS.

IT IS A CRIME TO KNOWINGLY PROVIDE FALSE, INCOMPLETE, OR MISLEADING INFORMATION TO AN INSURANCE COMPANY FOR THE PURPOSE OF DEFRAUDING THE COMPANY. PENALTIES INCLUDE IMPRISONMENT, FINES, AND DENIAL OF INSURANCE BENEFITS.

**Customer: PAPPAS, BETHANY**

2023 RIVI R1S Adventure w/Quad Motor Large Pack 4D UTV Electric- Electric LA SILVER

Estimate based on MOTOR CRASH ESTIMATING GUIDE and potentially other third party sources of data. Unless otherwise noted, (a) all items are derived from the Guide DR4EV02, CCC Data Date 07/10/2025, and potentially other third party sources of data; and (b) the parts presented are OEM-parts. OEM parts are manufactured by or for the vehicle's Original Equipment Manufacturer (OEM) according to OEM's specifications for U.S. distribution. OEM parts are available at OE/Vehicle dealerships or the specified supplier. OPT OEM (Optional OEM) or ALT OEM (Alternative OEM) parts are OEM parts that may be provided by or through alternate sources other than the OEM vehicle dealerships with discounted pricing. Asterisk (\*) or Double Asterisk (\*\*) indicates that the parts and/or labor data provided by third party sources of data may have been modified or may have come from an alternate data source. Tilde sign (~) items indicate MOTOR Not-Included Labor operations. The symbol (<>) indicates the refinish operation WILL NOT be performed as a separate procedure from the other panels in the estimate. Non-Original Equipment Manufacturer aftermarket parts are described as Non OEM, A/M or NAGS. Used parts are described as LKQ, RCY, or USED. Reconditioned parts are described as Recond. Recored parts are described as Recore. NAGS Part Numbers and Benchmark Prices are provided by National Auto Glass Specifications. Labor operation times listed on the line with the NAGS information are MOTOR suggested labor operation times. NAGS labor operation times are not included. Pound sign (#) items indicate manual entries.

Some 2024 vehicles contain minor changes from the previous year. For those vehicles, prior to receiving updated data from the vehicle manufacturer, labor and parts data from the previous year may be used. The CCC ONE estimator has a list of applicable vehicles. Parts numbers and prices should be confirmed with the local dealership.

The following is a list of additional abbreviations or symbols that may be used to describe work to be done or parts to be repaired or replaced:

**SYMBOLS FOLLOWING PART PRICE:**

m=MOTOR Mechanical component. s=MOTOR Structural component. T=Miscellaneous Taxed charge category. X=Miscellaneous Non-Taxed charge category.

**SYMBOLS FOLLOWING LABOR:**

D=Diagnostic labor category. E=Electrical labor category. F=Frame labor category. G=Glass labor category. M=Mechanical labor category. S=Structural labor category. (numbers) 1 through 4=User Defined Labor Categories.

**OTHER SYMBOLS AND ABBREVIATIONS:**

Adj.=Adjacent. Algn.=Align. ALU=Aluminum. A/M=Aftermarket part. Blnd=Blend. BOR=Boron steel. CAPA=Certified Automotive Parts Association. CFC=Carbon Fiber. D&R=Disconnect and Reconnect. HSS=High Strength Steel. HYD=Hydroformed Steel. Incl.=Included. LKQ=Like Kind and Quality. LT=Left. MAG=Magnesium. Non-Adj.=Non Adjacent. NSF=NSF International Certified Part. O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace. R&I=Remove and Install. R&R=Remove and Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel. Sect=Section. STS=Stainless Steel. Subl=Sublet. UHS=Ultra High Strength Steel. N=Note(s) associated with the estimate line.

CCC ONE Estimating - A product of CCC Intelligent Solutions Inc.

The following is a list of abbreviations that may be used in CCC ONE Estimating that are not part of the MOTOR CRASH ESTIMATING GUIDE:

BAR=Bureau of Automotive Repair. EPA=Environmental Protection Agency. NHTSA= National Highway Transportation and Safety Administration. PDR=Paintless Dent Repair. VIN=Vehicle Identification Number.

# WICRA

Washington Independent  
Collision Repairers  
Association

WICRA Repair Facility  
Questionnaire Presentation to  
The Office of Insurance  
Commissioner July 2023

## WICRA

### Washington Independent Collision Repairers Association

WICRA represents Independent, locally owned small businesses, provides education and training, discuss regulatory compliance as well as ethical and professional business practices. We seek to pass legislation to improve consumer protection for safe vehicle repairs.

We advocate and promote:

- Education and skills development for Collision Repair professionals.
- Ensure consumers get safe and proper repairs.
- Create networking opportunities between shops, vendors of parts, equipment, and other services.
- Foster relationships with industry leaders representing innovations in technology, vehicle construction materials, tools and equipment.
- Develop a Code of Ethics and Professional Conduct for Collision Repairers



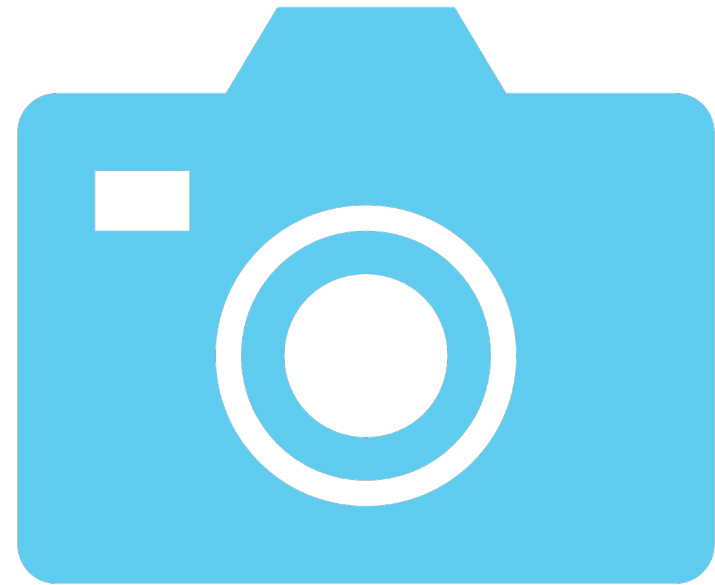
WICRA was asked to speak to the Insurance Commissioner's Office regarding photo estimating and the impacts it has had on the collision repair marketplace.

The information we are providing regarding photo estimating is compiled from a survey we sent to independent collision repair shops across Washington in the last 4 days (prior to July 17<sup>th</sup>, 2023). We sent out 65 plus surveys and received 30 responses.

The results of the survey reflect the market conditions in present time

# Photo Estimating Before Repairs

These Survey questions addressed how accurately vehicle damages were evaluated by insurers prior to a consumer taking their vehicle to a repair facility for an estimate or to have repairs performed.



## Question 1:

How many initial photo estimates from insurance companies do you see at your repair facility each month?

**Answer:**  
**1291 photo estimates**

30 independent shops reported seeing 1291 photo estimates at their repair facilities each month

## Question 2:

What percentage of these initial insurance photo estimates were accurate, and economically restore the vehicle to its pre-loss condition?

Answer:

Only 2% of insurer photo estimates were reported by collision repair professionals as accurate

That means 26 out of 1291 of insurer photo estimates were reported as accurate

80% of repairers reported that ***ZERO*** % of Insurance photo estimates they saw were accurate

### Question 3:

Shops were asked  
on a % basis  
(scale 0 - 100%),  
how accurate were  
the insurance  
photo estimates

#### Answer:

- 28% accurate for Small Damages
- 18.5% accurate for Moderate Damages
- 14% accurate for Major Damages

## Survey Question 4:

How many vehicles per month are driven to your repair facility that had an initial insurance photo estimate, **and were unsafe to drive?**

Note: unsafe is defined as the collision energy management system was compromised including deployment of air bags and/or seat belt pre-tensioners, air bag light is on (meaning air bags will not deploy), the vehicle has structural or frame damage, has suspension damage and/or has structural wheel damage, and/or has other issues that make the vehicle unsafe for the operator or other vehicles on the road.

# 319 unsafe vehicles

On average, per month, surveyed shops saw consumers drive 319 vehicles (or 24.7% of the vehicles they saw with photo estimates) to their repair facility that are unsafe to drive.

## Desk Review Estimates by Photos/Virtual Claims Processing

**This section  
addresses how  
insurers interact  
with repair  
facilities while a  
vehicle is repaired**



## Question 1:

What percentage of insurers send damage appraisers to your repair facility to perform in-person inspections, and discuss necessary repairs with your facility?

### Answer:

Just 6.6% of insurers sent field inspectors to repair facilities to inspect damaged vehicles and discuss the needed repairs with the shop

93.4% of automobile property damage claims are settled solely based on a review of photos



## Question 2:

When your repair facility submits an initial or supplemental repair plan with photos to an insurance company, how often does the insurer pay the full cost of the repairs from your initial submission?

**Answer:**

**6.9%**

**Shops reported that just 6.9% of the time, insurers responded with full payment the first time the information was submitted**

### Question 3:

On average, how often does your repair facility have to submit substantially the same information to an insurer or insurer's 3<sup>rd</sup> party adjuster or appraiser?

**Answer:**  
**70.6%**

Repair facilities reported they had to submit substantially the same information to the insurer over and over to an insurer before they received a response and/or full payment.

Responses ranged from 3 to 12 additional submissions with substantially the same information

#### Question 4:

When your repair facility submits an initial or supplemental repair plan with photos to an insurance company, how many days does it take for the insurer to respond?

**Answer:**

**Average  
response  
11.5 Days**

**Range 1 - 32  
days**

### Question 5:

When your repair facility submits photos to an insurer to document damage and repairs, have you ever had an insurance company adjuster tell you they can't see that much damage in the photos and reduce its payment for that portion of the repair?

If so, how often does this happen?

**Answer:**

**63.3%**

Of repair facilities said insurers routinely tell them, "we can't see all the damage" in the photos provided from the shops and listed on their repair invoice

## Question 6:

How often do insurance company adjusters deny your repair plan and tell you that your repair facility needs to provide a supplement based off the insurance estimate instead?

**Answer:**

**63.4%**

of surveyed shops reported that insurers regularly denied their repair plans and instead insisted the shop utilize the insurer's estimate to submit additional damages.

Insurers (arbitrarily) denied 818 estimates from the surveyed repair facilities over this period.

## Photo Claim Handling Results

The following slides were provided by the surveyed repair facilities. These slides represent the results of claims settled with photo-estimating

**\$8,760.00 Insurance photo estimate**

**\$31,269 actual costs to repair**





**\$2,277 Insurance photo estimate**

**\$19,604 Actual cost to repair**



Internal





**Close-up of  
silver Toyota  
Tacoma  
suspension  
damage in prior  
slide**

Internal

**\$5,894 Insurance photo estimate**

**\$12,682 Insurance estimate (based on photos) after vehicle at shop disassembled and diagnosed**

**\$20,007 actual repair costs**



Internal



**\$3,504 Insurance photo estimate**

**\$8142 initial shop estimate based on in-person inspection, prior to disassembly and diagnosis**

**\$15,193 actual costs to repair**



Internal

**\$649.15 Insurance photo estimate**

**\$5,448.00 Shops estimate based on in-person inspection**



Internal



**Bumper cover is broken, parking sensor is missing, splash shield is torn but is difficult to see in previous photo.**



**Same vehicle as previous slide.**

Internal

\$10,000 insurance photo estimate. This vehicle is unsafe to drive; Air bags have deployed; safety systems are inoperable, and the vehicle has significant structural and frame damage. **His insurer DID NOT advise their policy holder his vehicle was unsafe to operate.**

\$40,000 Repair shop estimate after in person inspection includes replacement of the trucks frame, right Uni-side, box assembly.



Internal

## Market place impacts of photo estimating and virtual claims adjusting that are currently being utilized by most of the insurance industry

- ▶ Thousands of consumers are unknowingly driving collision damaged vehicles that are unsafe to operate after getting a repair estimate from an insurance company. Vehicles with frame and structural damage and/or deployed air bags and other safety systems that are compromised WILL NOT perform as the vehicle manufacturer designed in a subsequent collision, but many insurers are not informing consumers of these safety hazards because either they are not vehicle repair experts and/or are simply trying to save money on towing and rental costs.
- ▶ Rental car coverage is unreasonably being exhausted due to large delays created by insurers when consumers wait day/weeks for insurers to respond to repair facilities damage analysis.
- ▶ Current insurance regulations allow insurers to settle claims based on repair estimates insurers themselves create but insurers are not vehicle repair experts and have no liability for the repairs. Insurance estimates are shown to be MASSIVELY DEFICIENT, up to 85% LESS than the actual costs to repair the vehicle.

## Market place impacts of photo estimating and virtual claims adjusting that are currently being utilized by most of the insurance industry

- ▶ Many consumers are left to pay out of pocket for a portion of vehicle repair costs beyond their insurance photo estimate payment, akin to having a second deductible that was not disclosed to them when they purchased the insurance.
- ▶ Insurers have shifted the burden and expense of investigating the claim to the consumer and/or their repair facility by relying on photo estimates and virtual claims adjustments.
- ▶ Many Insurers are using out of area adjusters or 3<sup>rd</sup> party adjuster services to write estimates but most of these adjusters are not auto repair experts, nor do they know Washington insurance claims settlement rules. This practice significantly and consistently undervalues claims settlements.
- ▶ The practice of insurance photo estimating unfairly undervalues thousands of claims settlement each month, and consumers **ARE NOT** consistently made whole, especially when repairs are not performed.



Why do the insurance regulation give credibility to estimates provided by insurers, but insurers are not auto repair experts nor do insurers have any liability for the repairs they are estimating?

**WAC 284-30-390**

**Acts or practices considered unfair in the settlement of motor vehicle claims.**

**(c) If the claimant chooses to take the loss vehicle to a repair facility where the overall cost to restore the loss vehicle to its condition prior to the loss exceeds the insurer's estimate, the claimant must be advised that he or she may be responsible for any additional amount above the insurer's estimate.**

**(a) A denial of the claimant's estimate for repairs to be completed at the chosen repair facility based solely on the repair facility's hourly rate is considered arbitrary if the rate does not result in a higher overall cost of repairs.**

(3) Why are there no standards defining what a “*reasonable investigation*” is for insurers in Washington state?

(11) Needs to be updated to include “*the repair facility chosen by the policy holder*”

#### **WAC 284-30-330**

**Specific unfair claims settlement practices defined.**

**The following are hereby defined as unfair methods of competition and unfair or deceptive acts or practices of the insurer in the business of insurance, specifically applicable to the settlement of claims:**

**(3) Failing to adopt and implement reasonable standards for the prompt investigation of claims arising under insurance policies.**

**(11) Delaying the investigation or payment of claims by requiring a first party claimant or his or her physician to submit a preliminary claim report and then requiring subsequent submissions which contain substantially the same information.**

# Recommendations to improve the marketplace and protect consumers

- ▶ Washington State needs law like Oregon, and should require a standard "Right To Appraisal" clause in all auto policies
- ▶ Washington State needs law to enforce the National Highway Transportation and Safety Administration federal standards for safe vehicles by mandating OEM repair procedures for safe vehicle repairs
- ▶ Revise the current WAC's to reflect 2023, not 1977 when the model claims act was passed
- ▶ Take enforcement action when insurers violate the Washington Administrative Code Unfair claims settlement practices and fine insurers for their violations.

# WICRA

Washington Independent  
Collision Repairers Association

Thank you for listening

Internal