

OIC Rules Coordinator

From: Randy White <randy@accurateab.com>
Sent: Monday, October 6, 2025 5:30 PM
To: OIC Rules Coordinator
Subject: Comment on R2025-05 – Support for Strong Anti-Steering Protections

External Email

Dear Commissioner and Rulemaking Staff,

I'm writing on behalf of Accurate Auto Body and the customers we serve every day. Our top priority has always been the safety of our customers and the integrity of every repair that leaves our facility. We're factory-certified with multiple OEMs including Rivian, Tesla, Mercedes-Benz, Jaguar, and Land Rover, and we take that responsibility seriously.

We strongly support clear and enforceable standards that ensure consumers receive safe, proper, and OEM-compliant repairs. With that in mind, I'd like to provide comment on the second prepublication draft of R2025-05, specifically regarding the need for stronger anti-steering language and clear accountability in who is considered a "competent" repair professional.

Insurers should not be allowed to pressure or mislead customers into using a Direct Repair Program (DRP) shop. We see this happen constantly. Customers tell us they were told they "have to" take their car to a specific shop, even after it's already been dropped off, authorized, and repairs have started. Even worse, customers who haven't yet dropped off their vehicle are often bombarded with phone calls and emails from insurance carriers trying to convince them not to schedule repairs with our shop. Many times, an insurer's initial cost estimate represents only a fraction of the actual repair cost—sometimes as little as 10%. Insurers often use these low initial figures to pressure claimants into choosing a cheaper repair option, only to increase the estimate later once the vehicle is already in their preferred shop. These tactics create confusion, delay necessary repairs, and undermine a consumer's right to choose. Washington drivers deserve the freedom to pick the repair facility they trust, without pressure or harassment.

DRP contracts also restrict what a shop can bill for, discouraging and outright preventing OEM-required procedures. These limitations are cost-driven, not safety-driven, and they put consumers at risk. Repairs should always follow manufacturer standards, not insurer cost targets.

Insurers also use discounted DRP rates to claim those are the "market rate." That's not a true market rate. It's an artificial one created by insurer-controlled contracts. A fair and competitive market can only exist when shops are free to operate without being held to insurer-imposed limitations.

The rule's language about relying on a "competent" vehicle repair person is important, but it needs to be clearly defined. An estimator working under an insurer's DRP agreement cannot be considered independent or competent if they are bound by what the insurer allows. Competence means following OEM repair procedures, acting without insurer interference, and having the proper experience and training to make the correct repair decisions.

Steering causes unnecessary stress, delays, and mistrust for consumers. We hear it every week from people who felt pressured or misled. Some even believing they aren't allowed to choose their own repairer. Others are in turmoil trying to understand the how much truth is behind an insurer's initial cost estimate and our repair plans. Strong, enforceable anti-steering language is essential to protect Washington drivers, ensure fair competition, and maintain the safety and integrity of collision repairs across our state.

Thank you for the opportunity to provide feedback.

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