



October 6, 2025

Via Electronic Mail (rulescoordinator@oic.wa.gov)

Office of the Insurance Commissioner, Washington State
P.O. Box 40255
Olympia, WA 98504-0255

Re: ***Rules Comment – Proposed Changes to Wash. Admin. Code 284-30-392
(Second Prepublication Draft)***

To Whom it May Concern:

CCC Intelligent Solutions, Inc. (“CCC”) respectfully submits the following comments concerning the Second Prepublication Draft changes to Wash. Admin. Code 284-30-300 through 284-30-400 relating to the claims handling minimum standards rule (the “Proposed Rule”). CCC has limited its comments on this draft to the proposed changes to Wash Admin. Code 284-30-392(4)(d), which adds a requirement that “[w]hen the insurer uses a computerized source for determining statistically valid actual cash value...[u]pon request from the claimant, the insurer must provide supporting information to demonstrate the comparable motor vehicle’s condition.”¹

This portion of the Proposed Rule appears to target comparable vehicles used by computerized sources without a clear and specified objective. Under WAC 284-30-391(2)(b)(i) and (iii), comparable vehicles can be used to determine actual cash value without condition documentation, even if requested by the claimant. If these ***exact same comparable vehicles*** are utilized by computerized databases such as CCC, the database and/or the insurer must collect and document the condition of these comparable vehicles in the event a claimant requests this evidence. No justification has been provided for mandating documentation of the condition of a comparable vehicle when accessed via a computerized database yet not requiring the same documentation when identical vehicles are referenced through alternative methods.

It would be infeasible for the insurer, or any third party, to inspect and document the condition of every comparable vehicle that could potentially be included in a valuation provided by a computerized database. For perspective, CCC currently maintains approximately eight million unique vehicles in its databases, including about 202,000 unique vehicles within Washington State. Over twenty million unique vehicles pass through CCC’s database annually, with approximately 490,000 in Washington State alone. Whether intended or not, this section of the Proposed Rule would disproportionality impede valuations conducted through computerized databases.

¹ The Proposed Rule contains other revisions about which CCC takes no position in this comment. CCC’s silence on any portion of the Proposed Rule should not be interpreted as either approval or disapproval. CCC reserves the right to comment on any portion of the Proposed Rule in the future should amendments or revisions warrant comment by CCC.



Not only does this portion of the Proposed Rule lack justification, but it also does not specify what forms of documentation would be acceptable. As previously indicated, physically inspecting and documenting the condition of every potential comparable vehicle is impossible. Indeed, physically inspecting vehicles offered by private sellers raises logistical and privacy challenges. It would also be unreasonably expensive and time consuming to discuss the condition of every comparable with every seller. Online advertisements featuring photos are typically removed after a sale, making them unavailable for future reference, and retaining all advertisements with images would be prohibitively costly and inefficient.

In all events, requiring documentation of every comparable vehicle used in valuations by a computerized database would impede the efficient operation of most computerized sources used for determining actual cash value. CCC is not aware of any other state that requires such documentation. It would place a strain on resources, extend claims processing times, and increase costs. For at least these reasons, CCC urges the proposed changes to Wash Admin. Code 284-30-392(4)(d) be stricken.

CCC appreciates the opportunity to comment on the Proposed Rule and looks forward to continued discussion regarding this matter. Please do not hesitate to contact me if you would like any additional information or to discuss anything further.

Sincerely,

/s/Kathleen P. Lally
Associate General Counsel