

OIC Rules Coordinator

From: Jared Osten <jared@centercollision.com>
Sent: Monday, October 6, 2025 11:59 AM
To: OIC Rules Coordinator
Subject: R2025-05 Second Prepublication Draft comment

External Email

Dear Commissioner and Rulemaking Staff,

On behalf of Center Collision, an independent OEM-certified repair facility and a member of the Washington Independent Collision Repairers Association (WICRA), I'm writing to provide input on proposed rule R 2025-05.

We support the intent to strengthen standards ensuring safe, OEM-compliant repairs. However, we have serious concerns with the language allowing insurers to rely on a "competent vehicle repair person"—a term that could be misused to justify steering consumers toward insurer-contracted Direct Repair Program (DRP) facilities.

DRP shops often operate under cost-control agreements that limit their ability to follow OEM repair procedures, risking safety, accuracy, and consumer choice. Without clear anti-steering protections in current Washington Administrative Code, this rule could unintentionally reinforce those practices.

We respectfully request that the rule be revised to:

Ensure “competent” means independent of insurer cost-control contracts and aligned with OEM procedures and industry-recognized training (e.g., I-CAR Platinum).

Prevent DRP agreements from being used to define competence.

Affirm a consumer’s right to choose their repair facility.

Include strong anti-steering provisions to protect safety, fairness, and transparency.

We appreciate your attention to these concerns and your commitment to protecting Washington consumers. Center Collision and our industry partners are ready to assist in creating rules that promote safe, high-quality repairs and fair market practices.

Sincerely,
Jared Osten
General Manager
Center Collision
253-779-8342
Jared@centercollision.com

Thanks,

Jared Osten

General Manager
1111 Center St.
Tacoma WA 98409
(253) 779-8342 office
(253) 722-5555 fax
Jared@centercollision.com