

Via email
October 6, 2025

Office of the Insurance Commissioner
Washington State

Re: Rule 2025-05 Clarifying and Updating the Minimum Standards for Claims Handling
(Second Prepublication Draft)

Dear Rules Committee:

Thank you for the opportunity to provide these comments on the second 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) Upon request from the claimant, 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."

Due to the number of comparable vehicles considered and utilized by a Computerized Source physical inspection is not feasible. If this language remains Mitchell respectfully suggests that the following options be considered by the Department.

1. 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, reflecting a condition more favorable than a Private-Sourced Comparable Vehicle as it has undergone the necessary dealer reconditioning to get it ready for sale.

2. Replace the proposed language with a requirement that only Dealer-Sourced Comparable Vehicles can be utilized. This would ensure that the comparable vehicles are in a more favorable condition.

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