October 6, 2025

VIA EMAIL

Rules Coordinator
Office of the Insurance Commissioner

RE: R 2025 Clarifying and updating the minimum standards for claims handling – Second Draft

Thank you for the opportunity to comment on the second pre-publication draft R 2025-05 proposing revisions to WAC 284-30.

Audatex remains seriously concerned with the continued inclusion of section 284-30-392(4)(d), which would require insurers to provide supporting information demonstrating the condition of each comparable motor vehicle used in a total loss valuation.

As we explained in our August 8, 2025 comments on the initial draft, this requirement is not merely burdensome—it is unworkable. It is simply impossible to provide supporting condition information for millions of vehicles contained in valuation databases. These vehicles are drawn from active listings across the country, updated daily, and cannot feasibly be verified through physical inspection or seller contact. No state has ever adopted such a requirement, and for good reason: it is operationally impossible to implement and would render modern valuation methodologies unusable.

Requiring this level of documentation would paralyze the total loss settlement process. Insurers would be unable to complete valuations in a timely manner, driving up administrative costs and delaying settlements for consumers who are often already facing hardship following a loss. The result would be slower, more expensive, and less efficient claim handling—precisely the opposite of what the regulation intends to achieve.

It is also important to emphasize that vehicles listed for sale at dealerships—the primary source for comparable listings—are already subject to thorough internal screening. Dealers do not offer vehicles that fail to meet basic safety and cosmetic standards for retail sale;

such vehicles are disposed of through wholesale channels. Imposing an additional, redundant condition-verification requirement serves no practical purpose and would only add inefficiency.

The goals of fairness and accuracy in total loss valuations are already met under the existing provisions of WAC 284-30-391. Section 284-30-392(4)(d) introduces a requirement that is operationally impossible, unsupported by any regulatory precedent, and contrary to the public interest. We therefore urge the OIC to remove this subsection from the final rule.

Audatex remains available to meet or provide additional information to assist the OIC as it continues to refine these regulations.

Sincerely,

Diane Zeni
Director Government and Regulatory Affairs
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