

## Stephens, Carmen (OIC)

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**From:** BRUCE, KELLY <KELLYBRUCE@ALLSTATE.COM>  
**Sent:** Monday, July 25, 2016 10:28 AM  
**To:** OIC Rules Coordinator

Commissioner Kreidler  
c/o Stacey Middleton  
Office of the Insurance Commissioner  
PO 40258,  
Olympia, WA 98504-0258  
[rulescoordinator@oic.wa.gov](mailto:rulescoordinator@oic.wa.gov)

Date: July 25, 2016

Subject: R 2015-15, mandatory credit reorder.

Dear Commissioner Kreidler:

I am a small business owner and resident from Vancouver, Washington. I own Kelly Huston-Bruce Allstate Insurance Agency, and I am writing to ask you to express my concerns about R 2015-15, the proposed rule requiring the reordering of credit information for all Washington residents with all property and casualty insurance that requires use of credit.

I understand you have a public hearing on R 2015-15 Tuesday, July 26, and I'd ask that you not pass this mandatory requirement.

I believe a better option is to allow the consumer to decide whether or not updating their credit information is beneficial to them. If they have recently experienced financial setbacks, they may not want to have their credit reordered. If their financial situation has improved, they can inform their insurer and seek a lowered premium. A process that empowers the consumer is more beneficial to policyholders, there are fewer negative consequences, less cost, less disruption, and fewer consumer complaints.

While Washington law allows the use of credit history by insurers, there is no current requirement that an insurer update the information over the wishes of their policyholder. Many insurers update the information

every three years but many other insurers provide their insured with the option of having their credit information updated annually on request.

A person with improved credit may qualify for a lower premium when credit is reordered. A person whose credit has declined may face increased premiums. A mandatory reorder creates winners and losers. It also will be startling and confusing to some consumers who may experience increased premiums due to their credit information. The proposed rule may also increase costs for some insurers, which may impact premiums for all of their insureds.

Allowing consumers to determine when their credit is updated is better for consumers and for small businesses like mine. This could be accomplished by either building in that option as an exception to the mandatory reorder requirement or by simply not adopting a rule and allowing the market to work.

Thank you for your time, and please feel free to contact me if I can provide additional information.

Sincerely,



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