



Idaho State Insurance Fund

July 27, 2018

Industrial Commission
Attn: Mindy Montgomery, Director
PO Box 83720
Boise, ID 83720-0041

RE: Negotiated Rulemaking for 17.02.10
Docket No. 17-0210-1802

Dear Committee:

The Idaho State Insurance Fund submits the following comments for your consideration:

- Under Section 051.06.b:
 - i. check or other readily negotiable instrument; or
 - ii. carrier provided debit card; or
 - iii. electronic transfer by mutual agreement between the carrier and the payee.

- Under Section 051.06.c:

If mutually agreed upon in writing, claimant may request that the insurance carrier make compensation payments by electronic transfer to a personal bank account. Claimant would provide the insurance carrier in writing or via the carrier's secure web site: the name of the financial institution, routing transit number, the account number, and type of account to which the claimant wants to have the compensation electronically transferred. The insurance carrier shall provide the claimant with a form to fill out that include all the information required by this subsection within seven (7) days of receiving a request for electronic transfer of payments from the claimant.

- Under Section 051.06.d:

Remove item iv: "This subsection does not apply to electronic transfer payments through a carrier's bank card." This statement does not apply to bankcards, as there is no claimant bank information required.

Sincerely,

Richard Burleigh
General Counsel
Idaho State Insurance Fund