

# WCCP

ASSOCIATION

# PCCP

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March 14, 2010

Eric Purvis  
Florida Department of Financial Services  
Division of Agent & Agency Services  
412 Larson Building  
200 E. Gaines Street  
Tallahassee, FL 32399-0320

RE: 2/19/2010 Notice of Proposed Rule Development – Adjusters  
Specifically, Rule 69B: 220.201 F.A.C. – Ethical Requirements

Dear Mr. Purvis:

On behalf of the more than 25,000 members and constituents of Florida's Associations of Workers' Compensation Claims Professionals (WCCP) and Property & Casualty Claims Professionals (PCCP), we hereby file notice of opposition to the proposed changes to Florida's Adjuster Code of Ethics as reflected in Rule 69B:220.201 F.A.C. – Ethical Requirements. Our objections are specifically, although not exclusively, directed at the changes in subsections (e) and (t), and the additions of subsections (f), (g) and (v).

Notwithstanding the intent, and potential relevancy, of these proposed changes, placement in the rule governing Ethical Requirements is inappropriate, as they are not guides for appropriate or inappropriate adjusting behavior(s); rather, they deal with matter of private contract (and may well infringe on the rights of contract between parties), performance measurement, and time requirements for such performance. We also object to the manner in which such change is attempted, i.e. embedded deeply, and arguably, deceptively, within changes directed specifically at those parties who are primarily involved in matters of emergency (i.e. catastrophe) or property adjusting and/or public adjusting rules of performance, when in fact, the Code of Ethics addresses all adjusters and every line of claims business.

On behalf of both Associations, I formally request that another open workshop be held, and that notification of the subject matter of such workshop be clearly indicated.

Sincerely,

*James W. Greer*

James W. Greer, CPCU  
President, PCCP Association  
Executive Director, WCCP Association