



April 27, 2018

Fred Bruyns, Rules Coordinator  
Workers' Compensation Division  
350 Winter Street NE  
Salem, OR 97309-0405

Re: Proposed Rules on Worker Leasing

Dear Fred,

Cardinal supports the proposed rules as written. This includes the proposed changes to Rule 155 of the new division, closing the gap in NCCI's data.

The offered rationale, for striking the NCCI reporting requirement, is insufficient. The correct comparison is not Barrett to other self-insured employers, but Barrett to other worker leasing companies. All are required to report unit statistical data to NCCI. All but Barrett pay a carrier to do it.

Exempting self-insured worker leasing companies restrains trade. It forces employers who are their clients, as well as carriers and worker leasing companies who might compete for their business, to wait on valuable risk data from an interested 3<sup>rd</sup> party. In every other situation, that data is readily available from NCCI.

Sincerely,

Arin J. Carmack  
CEO