

Bennett Katz, Zenith Insurance Company

March 19, 2014

We would like to offer one technical comment. On Page 11, under Section 9770(g), the definition of “International Classification of Diseases -10<sup>th</sup> Revision (ICD-10) code” says that it has a “4 or 5 digit number.” This was true for ICD-9. We believe this should now be changed to a “3 to 7 digit number.”

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How can the DWC publish this and add to the confusion of the regulations?

It really does not explain anything about use or requirements for ICD10?

Does the DWC intend to require ICD-10 as of a certain date?  
Please explain