

Greetings:

The American Council of Life Insurers hereby requests an opportunity to testify at the EBSA hearing on December 7, 2010 on issues relating to the disclosure of fee and other information by service providers to group health, disability, severance and other employee welfare benefit plans under section 408(b)(2) of the Employee Retirement Income Security Act. We would like to address the following topic:

1. How non-medical ERISA welfare benefit plans such as dental, life, disability, long term care and critical illness differ from pension plans in terms of product type, features, operation, regulation and existing disclosure requirements.(4 minutes).
2. Why the 408(b)(2) disclosure rules for service provider disclosure to pension plans should not apply to non-medical ERISA welfare benefit plans such as dental, life, disability, long term care and critical illness. (6 minutes)

Thank you,

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