



AMERICAN BENEFITS  
COUNCIL

November 17, 2010

Employee Benefits Security Administration  
Office of Regulations and Interpretations  
**ATTN: 408(b)(2) Hearing on Fee Disclosures to Welfare Benefit Plans**  
Rooms N-5655  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

Dear Sir or Madam:

On behalf of the American Benefits Council (the "Council"), I formally request the opportunity to testify at the public hearing on "Reasonable Contracts or Arrangements for Welfare Benefit Plans Under Section 408(b)(2) – Welfare Plan Fee Disclosure," currently scheduled for December 7. Set forth below is an outline of the topics we will address.

1. Fully-insured health plans (3 minutes)
2. Self-insured health plans (4 minutes)
3. Fully-insured welfare plans other than health plans (3 minutes)

Thank you for the opportunity to testify.

Sincerely,

Kathryn Wilber  
Senior Counsel, Health Policy