



Prudential

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November 14, 2007

Office of Regulations and Interpretations
Employee Benefits Security Administration
Room N-5669
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210
Attn: Annuity Regulation

Re: Comment on Proposed Regulation on Selection of Annuity Providers for Individual Account Plans

Dear Sir/Madam:

We are writing to express support of Prudential Insurance Company and its Retirement division for the comment letters on the Department's proposed regulation on the Selection of Annuity Providers for Individual Account Plans submitted by the American Council of Life Insurers (ACLI) and the American Benefits Council (ABC).

Prudential Retirement delivers retirement plan solutions for public, private, and non-profit organizations. Services include state-of-the-art record keeping, administrative services, investment management, comprehensive employee investment education and communications, and trustee services. With over 80 years of retirement experience, Prudential Retirement meets the needs of nearly 3.2 million participants and annuitants. Prudential Retirement has \$157.2 billion in retirement account values as of September 30, 2007.

As the ABC stated in its letter, while it is important that there be fiduciary standards, "it is important to do this in a manner that does not unduly burden the fiduciary so as to discourage plans from selecting products that may help employees fund a secure retirement." Further, as employers begin examining new, innovative products to help create more defined benefit-like outcomes for their defined contribution plans, "it will be important to balance the desire to establish rigorous fiduciary standards with the need for

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efficient administration that helps plan sponsors provide options that in turn help plan participants protect against longevity risks.”

We are concerned that the proposed regulation may impose requirements and standards that are inimical to promoting the use of guaranteed lifetime income forms of distribution in individual account plans. As well, we have questions about the scope of the regulation and the products to which it would extend. We hope to have an opportunity to meet with you to discuss our concerns and the important issues related to providing defined contribution plan participants with guaranteed income for life as efficiently as possible.

Respectfully submitted,

