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To: EBSA, E-ORI - EBSA
Subject: RIN 1210-AB20

My comments on retirement plan requirements to provide lifetime income information to plan participants:

This requirement is not necessary and would be a burden on existing plans to offer lifetime income options within their qualified plan. These products, especially with respect to variable annuities, are very expensive to provide. There are numerous insurance companies offering these type of products with "Living Benefits" and all that would be needed is clear language to be provided by plan administrators in plan documents to allow in-service transfers/rollovers prior to the age of 59 1/2. This would enable plan participants to directly roll over their plan assets in to one of insurance products. Many of these products "lock in" the initial premium and allow for annual step-ups, either by a guaranteed percentage or market performance, where the individuals retirement balance goes up every year even if the cash value decreases.

Example:

An individual age 55, has worked for the same company for his entire life and has amassed \$640,000 in his 401K. He wants to retire when he is 60. When he is 58, we get a repeat of 2008 and his 401K drops to \$320,000. He now cannot retire in two years. However, if he places \$600,000 in an insurance product with "Living Benefits", the amount he is guaranteed to be paid on would be the initial premium of \$600,000, even if the cash value gets cut in half to \$300,000. That would provide a lifetime income stream in retirement of \$30,000 per year. In addition, that \$600,000 retirement number would grow to over \$700,000 by the time he was 60 years old meaning he would get paid around \$35,000 per year for life in retirement. This individual would be able to get a good night's sleep for the next five years knowing full well he will be able to retire in five years.

At present, language in the Treasury Regulations make it impossible to interpret. Change that to allow for in-service transfers prior to the age of 59 1/2 and problem solved.

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