

10000 North Central Expressway Suite 1500 Dallas, TX 75231 USA

Tel +1 214 863 5500 Fax +1 214 863 5501

milliman.com

August 16, 2010

Employee Benefits Security Administration, U.S. Department of Labor Attn: Lifetime Income Joint Hearing Room N—5655
200 Constitution Avenue NW Washington, DC 20210

Re: Request to Testify at Lifetime Income Joint Hearing

Dear Sir or Madam:

As part of Milliman, Inc., I respectfully request to testify at the Lifetime Income Joint Hearing scheduled for September 14, 2010. Milliman is a firm of consultants and actuaries serving the full spectrum of business, governmental, and financial organizations. Founded in 1947, the firm has 52 offices in principal cities worldwide.

Milliman pioneered the field of financial risk management and continues to set industry standards for innovation and best practice. My testimony evolves from Milliman's role as the leading provider of risk management services to the life insurance industry for equity-based lifetime retirement income products. Globally, Milliman is responsible for the risk management of US\$500 billion of such products, representing over 6 million client accounts.

My testimony would focus on issue #4, Fiduciary Safe Harbor for Selection of Lifetime Income Issuer or Product. I intend to cover the following topics in a 10-minute discussion:

- Describe the value of guarantee structures (currently sold in the marketplace) that allow participants to stay allocated to equity funds and maintain control of their assets (2 minutes)
- Describe the leverage such products create, with reference to the impact of the 2008 financial crisis on guarantee values for products in the marketplace (2 minutes)
- Explain the basic, industry-standard risk management techniques that companies used to meet their obligations in this time of crisis (2 minutes)
- Discuss the considerations in extrapolating these products and risk management techniques to the 401(k) and IRA space (4 minutes)

Thank you for your consideration of my request. You may reach me with any questions at (214) 863-5104.

Sincerely,

Tamara Burden, CFA, FSA, MAAA Principal

Milliman, Inc.

Jamana Bunden