



October 26, 2017

Submitted Electronically

Office of Regulations and Interpretations
Employee Benefits Security Administration, Room N-5655
U.S. Department of Labor
200 Constitution Avenue NW
Washington DC 20210
Attention: Claims Procedure for Plans Providing Disability Benefits Examination

Subject: Claims Procedure for Plans Providing Disability Benefits; Extension of Applicability Date (RIN 1210-AB39)

Dear Sir/Madam:

On behalf of ReedGroup, please accept the following comments in support of the Department of Labor's ("Department") proposal to extend the January 1, 2018 applicability date of the Final Rule amending the claims procedure requirements applicable to ERISA-covered employee benefits plans that provide disability income benefits ("Final Rule"). ReedGroup, a wholly owned subsidiary of The Guardian Life Insurance Company of America[®], is a recognized leader in helping organizations reduce the cost, compliance risk, and complexity of employee absence. For over 30 years, we have provided products and services to build a better health-productivity balance for both our clients and their employees in the pursuit of returning employees to their full activity, and keeping businesses thriving with a skilled workforce.

ReedGroup's products and services address the Family and Medical Leave Act, the Americans with Disabilities Act, state and municipal leave laws, workers' compensation, and short- and long-term disability programs. ReedGroup is a third-party administrator ("TPA") for self-funded, ERISA-governed disability programs. It is through this perspective that we respectfully submit comments to the Department as part of its Proposed Rule.

ReedGroup supports the Department's proposal to delay the applicability date of the Final Rule. A delay will enable the Department to review new industry data and reevaluate the costs and benefits of the Final Rule. Without the delay, ReedGroup and other TPAs, plans, and insurance carriers will be forced to incur unnecessary costs to build out compliance and disclosure systems that may be jettisoned if the Department ultimately makes changes to the Final Rule. This effort would be an inefficient use of ReedGroup's personnel and financial resources.

Given the expected volume of comments and data the Department will likely receive as part of this comment process, ReedGroup believes that a 90-day delay is not sufficient time to review new information and conduct a thorough regulatory impact analysis. Further, regulatory changes made to the Final Rule upon the completion of the Department's examination, if any, will likely require additional transition time as the industry prepares for implementation. Therefore, ReedGroup recommends at least an additional 180-day transition period to enable implementation of any revised Final Rule.

ReedGroup is committed to fully complying with the Final Rule. However, given the contemplated modifications to the rule's requirements, immediate clarity from the Department on a delay is critical as our company may need to realign our compliance and implementation efforts, personnel training and customer communications.

Thank you for providing ReedGroup with the opportunity to comment. If I can provide any further assistance, please contact me.

Respectfully Submitted,

A handwritten signature in blue ink that reads "M. G. Holstein". The signature is written in a cursive style with a large initial "M" and "G".

Megan Holstein, Esq.

Vice President of Compliance